# PART 70 OPERATING PERMIT

# OFFICE OF AIR MANAGEMENT

**Newmar Corporation**
**355 North Delaware Street**
**Nappanee, Indiana 46550-0030**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 and 326 IAC 2-1-3.2 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

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|---|---|
| Operation Permit No.: T039-7571-00157 | |
| Issued by:<br>Janet G. McCabe, Assistant Commissioner<br>Office of Air Management | Issuance Date: |

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## SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

### A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary motor home and travel trailer manufacturing facility.

| | |
|---|---|
| Responsible Official: | Mr. Virgil Miller |
| Source Address: | 355 North Delaware Street, Nappanee, Indiana 46550-0030 |
| Mailing Address: | P.O. Box 30, Nappanee, Indiana 46550-0030 |
| SIC Code: | 3716 and 3792 |
| County Location: | Elkhart |
| County Status: | Attainment for all criteria pollutants |
| Source Status: | Part 70 Permit Program<br>Minor Source under PSD;<br>Major Source, Section 112 of the Clean Air Act |

### A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

a) EU-01 (Hardwoods)
- One (1) Spray Paint Booth B-1, equipped with six (6) high volume low pressure (HVLP) spray guns for coating of interior wood components with a maximum capacity of four (4) recreational vehicles per hour, with dry filters for the particulate matter overspray control, and exhausting to stack SV1-1 and SV1-2. (1982)
- One (1) Dip Tank, with a capacity of four (4) units per hour, exhausting to general ventilation. (1982)

b) EU-02 (Custom Coating)
- Two (2) high volume low pressure (HVLP) spray applications for coating recreational vehicles/motor homes in each downdraft paint booth identified as B-2a and B-2b, each with a maximum capacity of one (1) recreational vehicle per hour, dry filters for the particulate matter overspray control, each booth exhausting to two separate stacks identified as SV2-3a, SV2-3b and SV2-4a, SV2-4b respectively. (1998)

c) EU-03 (Frames), One (1) Spray Paint Booth B-3, equipped with two (2) high volume low pressure (HVLP) spray application for coating metal frames, with a maximum capacity of four (4) frames per hour, using dry filters as particulate matter overspray control, and exhausting to stack SV-3. (1990)

d) EU-04 (Adhesives), One (1) Spray Paint Booth B-4, equipped with two (2) HVLP spray guns, with a maximum capacity of four (4) units per hour, using dry filters as control, and exhausting to stacks SV4-1 and SV4-2. (1983)

e) EU-05 (FRP), One (1) FRP Booth (seam work on special orders), equipped with three (3) high volume low pressure (HVLP) spray and hand lay up application for coating fiberglass touch up and repair operation, with a maximum capacity of 0.12 units per hour, using dry filters for particulate matter overspray control, and exhausting to stack SV-5. (1995)

f) EU-06 (R&D, Service & Warranty)
- One (1) spray paint booth (® & D), equipped with one (1) air atomized spray gun for fiberglass mold coating, with a production rate of 0.0031 unit per hour, located at Research and Development Center. (1996)
- Two (2) spray coating booths, identified as BR-1 and BR-2, equipped with HVLP spray guns, using dry filters for overspray control, and exhausting at two (2) stacks, identified as SV6-1 and SV6-2. These booths have not been installed yet. When these are installed, the proper notification will be submitted to IDEM. (1998)

g) EU-07 (Woodworking)
- One (1) woodworking shop equipped with woodworking equipment, located in Building 3, using one (1) baghouse as control and exhausting internally, located at North Delaware Street. (1981)
- One (1) woodworking shop equipped with woodworking equipment, with a wood usage of 61 pounds per hour, attached to a portable dust collector as particulate control, exhausted internally, located at Research and Development Center. (1996)
- One (1) woodworking and machining shop equipped with woodworking and metalworking equipment, with one table saw attached to a portable dust collector as particulate control, exhausted internally, with a maximum capacity of sixty (60) pounds per hour wood, ten (10) pounds per hour plastic and fiberglass, and twelve (12) pounds per hour steel processing capacity, located at Service and Repair Center. (1998)

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

a) Welding operations

b) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

(a) It is a major source, as defined in 326 IAC 2-7-1(22);

(b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

## SECTION B GENERAL CONDITIONS

B.1 Permit No Defense [326 IAC 2-1-10] [IC 13]

(a) Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7.

(b) This prohibition shall not apply to alleged violations of applicable requirements for which the Commissioner has granted a permit shield in accordance with 326 IAC 2-1-3.2 or 326 IAC 2-7-15, as set out in this permit in the Section B condition entitled "Permit Shield."

B.2 Definitions [326 IAC 2-7-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, any applicable definitions found in IC 13-11, 326 IAC 1-2 and 326 IAC 2-7 shall prevail.

B.3 Permit Term [326 IAC 2-7-5(2)]

This permit is issued for a fixed term of five (5) years from the effective date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3.

B.4 Enforceability [326 IAC 2-7-7(a)]

(a) All terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM.

(b) Unless otherwise stated, terms and conditions of this permit, including any provisions to limit the source's potential to emit, are enforceable by the United States Environmental Protection Agency (U.S. EPA) and citizens under the Clean Air Act.

B.5 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

B.6 Severability [326 IAC 2-7-5(5)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.7 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

This permit does not convey any property rights of any sort, or any exclusive privilege.

B.8 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)]

(a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(b) The Permittee shall furnish to IDEM, OAM, within a reasonable time, any information that IDEM, OAM, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit.

(c) Upon request, the Permittee shall also furnish to IDEM, OAM, copies of records required to be kept by this permit. If the Permittee wishes to assert a claim of confidentiality over any of the furnished records, the Permittee must furnish such records to IDEM, OAM, along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAM, or the U.S. EPA, to furnish copies of requested records directly to U. S. EPA, and if the Permittee is making a claim of confidentiality regarding the furnished records, then the Permittee must furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.

B.9 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

(a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit constitutes a violation of the Clean Air Act and is grounds for:

(1) Enforcement action;

(2) Permit termination, revocation and reissuance, or modification; or

(3) Denial of a permit renewal application.

(b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

B.10 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)]

(a) Any application form, report, or compliance certification submitted under this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification, and any other certification required under this permit, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) One (1) certification shall be included, on the attached Certification Form, with each submittal.

(c) A responsible official is defined at 326 IAC 2-7-1(34).

B.11 Annual Compliance Certification [326 IAC 2-7-6(5)]

(a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The certification shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than April 15 of each year to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

(b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

(c) The annual compliance certification report shall include the following:

(1) The identification of each term or condition of this permit that is the basis of the certification;

(2) The compliance status;

(3) Whether compliance was based on continuous or intermittent data;

(4) The methods used for determining compliance of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3);

(5) Any insignificant activity that has been added without a permit revision;

(6) Such other facts, as specified in Sections D of this permit, as IDEM, OAM, may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.12 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, including the following information on each facility:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission units and associated emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond its control, the PMP cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that lack of proper maintenance does not cause or contribute to a violation of any limitation on emissions or potential to emit.

(c) PMP's shall be submitted to IDEM, OAM, upon request and shall be subject to review and approval by IDEM, OAM.

B.13 Emergency Provisions [326 IAC 2-7-16]

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-7-16.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

(2) The permitted facility was at the time being properly operated;

(3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAM within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Management, Compliance Section), or
Telephone Number: 317-233-5674 (ask for Compliance Section)
Facsimile Number: 317-233-5967

(5) For each emergency lasting one (1) hour or more, the Permittee submitted notice, either in writing or facsimile, of the emergency to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

(A) A description of the emergency;

(B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

(6) The Permittee immediately took all reasonable steps to correct the emergency.

(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions) for sources subject to this rule after the effective date of this rule. This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) IDEM, OAM may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(9) be revised in response to an emergency.

(f) Failure to notify IDEM, OAM by telephone or facsimile of an emergency lasting more than one (1) hour in compliance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.

(g) Operations may continue during an emergency only if the following conditions are met:

(1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

(2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:

(A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and

(B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value.

Any operation shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

B.14 Permit Shield [326 IAC 2-7-15]

(a) This condition provides a permit shield as addressed in 326 IAC 2-7-15.

(b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. Compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that:

(1) The applicable requirements are included and specifically identified in this permit; or

(2) The permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable.

(c) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAM shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.

(d) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application.

(e) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:

(1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;

(2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;

(3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and

(4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.

(f) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).

(g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAM has issued the modifications. [326 IAC 2-7-12(c)(7)]

(h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAM has issued the modification. [326 IAC 2-7-12(b)(8)]

B.15 Multiple Exceedances [326 IAC 2-7-5(1)(E)]

Any exceedance of a permit limitation or condition contained in this permit, which occurs contemporaneously with an exceedance of an associated surrogate or operating parameter established to detect or assure compliance with that limit or condition, both arising out of the same act or occurrence, shall constitute a single potential violation of this permit.

B.16 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

(a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ten (10) calendar days from the date of the discovery of the deviation.

(b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:

(1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or

(2) An emergency as defined in 326 IAC 2-7-1(12); or

(3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.

(4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

(c) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. The notification does not need to be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).

(d) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.

B.17 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)]

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAM determines any of the following:

(1) That this permit contains a material mistake.

(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]

(c) Proceedings by IDEM, OAM to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAM at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAM may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.18 Permit Renewal [326 IAC 2-7-4]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

(b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]

(1) A timely renewal application is one that is:

(A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

(B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM on or before the date it is due. [326 IAC 2-5-3]

(2) If IDEM, OAM, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

(c) Right to Operate After Application for Renewal [326 IAC 2-7-3]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAM, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAM, any additional information identified as being needed to process the application.

(d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]
If IDEM, OAM fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.19 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

(a) The Permittee must comply with the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.20 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12 (b)(2)]

(a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.

(b) Notwithstanding 326 IAC 2-7-12(b)(1)(D)(I) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.21 Changes Under Section 502(b)(10) of the Clean Air Act [326 IAC 2-7-20(b)]

The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a) and the following additional conditions:

(a) For each such change, the required written notification shall include a brief description of the change within the source, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.

(b) The permit shield, described in 326 IAC 2-7-15, shall not apply to any change made under 326 IAC 2-7-20(b).

B.22 Operational Flexibility [326 IAC 2-7-20]

(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:

(1) The changes are not modifications under any provision of Title I of the Clean Air Act;

(2) Any approval required by 326 IAC 2-1 has been obtained;

(3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

(5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAM in the notices specified in 326 IAC 2-7-20(b), (c)(1), and (e)(2).

(b) For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

(1) A brief description of the change within the source;

(2) The date on which the change will occur;

(3) Any change in emissions; and

(4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).

(d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAM, or U.S. EPA is required.

(e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.23 Construction Permit Requirement [326 IAC 2]
Except as allowed by Indiana P.L. 130-1996 Section 12, as amended by P.L. 244-1997, modification, construction, or reconstruction shall be approved as required by and in accordance with 326 IAC 2.

B.24 Inspection and Entry [326 IAC 2-7-6(2)]
Upon presentation of proper identification cards, credentials, and other documents as may be required by law, the Permittee shall allow IDEM, OAM, U.S. EPA, or an authorized representative to perform the following:

(a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

(c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.
[326 IAC 2-7-6(6)]

(1) The Permittee may assert a claim that, in the opinion of the Permittee, information removed or about to be removed from the source by IDEM, OAM, or an authorized representative, contains information that is confidential under IC 5-14-3-4(a). The claim shall be made in writing before or at the time the information is removed from the source. In the event that a claim of confidentiality is so asserted, neither IDEM, OAM, nor an authorized representative, may disclose the information unless and until IDEM, OAM, makes a determination under 326 IAC 17-1-7 through 326 IAC 17-1-9 that the information is not entitled to confidential treatment and that determination becomes final. [IC 5-14-3-4; IC 13-14-11-3; 326 IAC 17-1-7 through 326 IAC 17-1-9]

(2) The Permittee, and IDEM, OAM, acknowledge that the federal law applies to claims of confidentiality made by the Permittee with regard to information removed or about to be removed from the source by U.S. EPA. [40 CFR Part 2, Subpart B]

B.25 Transfer of Ownership or Operation [326 IAC 2-1-6] [326 IAC 2-7-11]

Pursuant to 326 IAC 2-1-6 and 326 IAC 2-7-11:

(a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAM, Permits Branch, within thirty (30) days of the change. Notification shall include a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the Permittee and the new owner.

(b) The written notification shall be sufficient to transfer the permit to the new owner by an administrative amendment pursuant to 326 IAC 2-7-11. The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) IDEM, OAM, shall reserve the right to issue a new permit.

B.26 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

(a) The Permittee shall pay annual fees to IDEM, OAM, within thirty (30) calendar days of receipt of a billing. If the Permittee does not receive a bill from IDEM, OAM the applicable fee is due April 1 of each year.

(b) Failure to pay may result in administrative enforcement action, or revocation of this permit.

(c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAM, Technical Support and Modeling Section), to determine the appropriate permit fee.

B.27 Advanced Source Modification Approval [326 IAC 2-7-5(16)]

The requirements to obtain a source modification approval under 326 IAC 2-7-10.5 or a permit modification under 326 IAC 2-7-12 are satisfied by this permit for the proposed emission units, control equipment or insignificant activities in Sections A.2 and A.3 if such modifications occur during the term of this permit.

**SECTION C SOURCE OPERATION CONDITIONS**

Entire Source

**Emission Limitations and Standards [326 IAC 2-7-5(1)]**

C.1 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.

C.4 Incineration [326 IAC 4-2][326 IAC 9-1-2]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2.

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.6 Fugitive Particulate Matter Emission Limitations [326 IAC 6-5]

Pursuant to 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations), fugitive particulate matter emissions shall be controlled according to the plan submitted on July 18, 1997. This plan consists of adding gravel as needed to the unpaved stone and gravel roadways.

C.7 Operation of Equipment [326 IAC 2-7-6(6)]

All air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.8 Stack Height [326 IAC 1-7]

The Permittee shall comply with the provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted.

C.9 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are mandatory for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

**Testing Requirements [326 IAC 2-7-6(1)]**

C.10 Performance Testing [326 IAC 3-6]

(a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing methods approved by IDEM, OAM.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

(b) All test reports must be received by IDEM, OAM within forty-five (45) days after the completion of the testing. An extension may be granted by the Commissioner, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

**Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]**

C.11 Compliance Schedule [326 IAC 2-7-6(3)]

The Permittee:

(a) Has certified that all facilities at this source are in compliance with all applicable requirements;

(b) Has submitted a statement that the Permittee will continue to comply with such requirements; and

(c) Will comply with such requirements that become effective during the term of this permit.

C.12 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment, no more than ninety (90) days after receipt of this permit. If due to circumstances beyond its control, this schedule cannot be met, the Permittee shall notify:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

C.13 Maintenance of Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]

(a) In the event that a breakdown of the monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less than one (1) hour until such time as the continuous monitor

is back in operation.

(b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

C.14 Monitoring Methods [326 IAC 3]

Any monitoring or testing performed to meet the requirements of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

C.15 Pressure Gauge Specifications

Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ( ±2%) of full scale reading.

**Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]**

C.16 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

(a) The Permittee prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures on April 8, 1998.

(b) If the ERP is disapproved by IDEM, OAM, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.

(c) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.

(d) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.

(e) Upon direct notification by IDEM, OAM, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level.
[326 IAC 1-5-3]

C.17 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present in more than the threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall:

(a) Submit:

(1) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or

(2) As a part of the compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and

(3) A verification to IDEM, OAM, that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.

(b) Provide annual certification to IDEM, OAM, that the Risk Management Plan is being properly implemented.

C.18 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5(3)]

(a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:

(1) This condition;

(2) The Compliance Determination Requirements in Section D of this permit;

(3) The Compliance Monitoring Requirements in Section D of this permit;

(4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and

(5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAM, upon request and shall be subject to review and approval by IDEM, OAM. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of :

(A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and

(B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.

(b) For each compliance monitoring condition of this permit, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.

(c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:

(1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.

(2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied or;

(3) An automatic measurement was taken when the process was not operating; or

(4) The process has already returned to operating within "normal" parameters and no response steps are required.

(d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

C.19 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM reserves the authority to use enforcement activities to resolve noncompliant stack tests.

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.

**Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

C.20 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

(a) The Permittee shall submit a certified, annual emission statement that must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:

(1) Indicate actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);

(2) Indicate actual emissions of other regulated pollutants from the source, for purposes of Part 70 fee assessment.

(b) The annual emission statement covers the twelve (12) consecutive month time period starting December 1 and ending November 30. The annual emission statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

C.21 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]

(a) With the exception of performance tests conducted in accordance with Section C - Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.

(b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.

(c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.

(d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.

(e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.

(f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

C.22 General Record Keeping Requirements [326 IAC 2-7-5(3)(B)]

(a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon request of an IDEM, OAM, representative. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

(b) Records of required monitoring information shall include, where applicable:

(1) The date, place, and time of sampling or measurements;

(2) The dates analyses were performed;

(3) The company or entity performing the analyses;

(4) The analytic techniques or methods used;

(5) The results of such analyses; and

(6) The operating conditions existing at the time of sampling or measurement.

(c) Support information shall include, where applicable:

(1) Copies of all reports required by this permit;

(2) All original strip chart recordings for continuous monitoring instrumentation;

(3) All calibration and maintenance records;

(4) Records of preventive maintenance shall be sufficient to demonstrate that improper maintenance did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.

(d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.23 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

(a) To affirm that the source has met all the requirements stated in this permit the source shall submit a Quarterly Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported.

(b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

(d) Unless otherwise specified in this permit, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period.

(e) All instances of deviations as described in Section B - Deviations from Permit Requirements Conditions must be clearly identified in such reports.

(f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.

(g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

**Stratospheric Ozone Protection**

C.24 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

(a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.

(b) Equipment used during the maintenance, service, repair, or disposal of appliances must

comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

(c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

**SECTION D.1 FACILITY OPERATION CONDITIONS**

Facility Description [326 IAC 2-7-5(15)]:
EU-01 (Hardwoods), One (1) Spray Paint Booth B-1, equipped with six (6) high volume low pressure (HVLP) spray guns for coating of interior wood components with a maximum capacity of four (4) recreational vehicles per hour, with dry filters for the particulate matter overspray control, and exhausting to stack SV1-1 and SV2-1. (1982)
One (1) Dip Tank B-1 with a capacity of four (4) units per hour, exhausting to general ventilation. (1982)

**Emission Limitations and Standards [326 IAC 2-7-5(1)]**

D.1.1 Volatile Organic Compounds (Wood Furniture and Cabinet Coating) [326 IAC 8-2-12] [326 IAC 2-2]

(a) Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the surface coatings applied to wood furniture and/or wood components in paint area identified as B-1, shall utilize one or more of the following application methods:

| | |
|---|---|
| Airless Spray Application | Air-Assisted Airless Spray Application |
| Electrostatic Spray Application | Electrostatic Bell or Disc Application |
| Heated Airless Spray Application | Roller Coating |
| Brush or Wipe Application | Dip-and-Drain Application |
| High Volume Low Pressure HVLP | Aerosol Spray Cans |

(b) High volume low pressure spray is an acceptable alternative application of air-assisted airless spray. High volume low pressure (HVLP) spray means technology used to apply coating to a substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

(c) The input VOC to the paint area B-1 and the usage of cleanup solvent for the paint area B-1 (the usage of cleanup solvent may need to take into account any recycling of cleanup rags or reused solvent), in combination with input VOC from Spray Paint Booth B-3, FRP Booth, and insignificant activities, shall be limited to < 156 tons per 12 consecutive month period. This limitation will prevent the VOC emissions from the entire source to less than 250 tons per year and make 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

D.1.2 General Provisions Relating to HAPs [326 IAC 20-1-1] [40 CFR 63, Subpart A]

The provisions of 40 CFR 63 Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the facility described in this section except when otherwise specified in 40 CFR 63 Subpart JJ.

D.1.3 Volatile Hazardous Air Pollutant (VHAP) [326 IAC 14] [40 CFR Part 63.802] [40 CFR Subpart JJ]

Pursuant to 40 CFR 63, Subpart JJ (National Emission Standards for Wood Furniture Manufacturing Operations):

(a) The volatile organic hazardous air pollutant (VHAP) emissions from wood kitchen cabinet surface coating operations in the paint area identified as B-1 shall be limited to:

| Coatings | Limit<br>(lb. of VHAP / lb. of solid applied) |
|---|---|
| weighted average VHAP content all coatings | 0.8 |
| stains | 1.0 |
| wash coats, sealers, topcoats, base coats, and enamels | 0.8 |
| thinners used for on-site formulation of washcoats, basecoats, and enamels (maximum % allowable) | 3.0 |
| all other thinners (maximum % allowable) | 10.0 |
| strippable spray booth material<br>(maximum VOC content, lbs VOC/lb Solids) | 0.80 |
| contact adhesive (excluding aerosol adhesive and contact adhesive applied to nonporous substrates) | 0.2 |

Where VHAP is defined as any hazardous air pollutant listed in Table 2 Subpart JJ.

(b) The wood furniture coating operation is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP), 326 IAC 20-14, (40 CFR 63, Subpart JJ), with a compliance date of upon startup.

D.1.4 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2 (Particulate Emissions Limitations), the PM from the spray area B-1 shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10\ P^{0.67}$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

D.1.5 Work Practice Standards [326 IAC 14] [40 CFR Part 63.803]

Pursuant 326 IAC 14 & 40 CFR 63, Subpart JJ (National Emission Standards for Wood Furniture Manufacturing Operations):

(a) The owner or operator of the spray paint area B-1 subject to this subpart shall prepare and maintain a written work practice implementation plan that defines environmentally desirable work practices for each wood furniture manufacturing operation and addresses each of the work practice standards presented in paragraphs (b) through (l) of this section. The plan shall be developed no more than 60 days after the issuance date of this permit. The written work practice implementation plan shall be available for inspection by the EPA and IDEM upon request. If the EPA and IDEM determines that the work practice implementation plan does not adequately address each of the topics specified in paragraphs (b) through (l) of this section or that the plan does not include sufficient mechanisms for ensuring that the work practice standards are being implemented, the EPA and IDEM may require the affected source to modify the plan. Revisions or modifications to the plan do not require a revision of the source's Title V permit.

(b) The owner or operator of the spray paint area B-1 shall train all new and existing personnel, including contract personnel, who are involved in finishing, gluing, cleaning, and washoff operations, use of manufacturing equipment, or implementation of the requirements of this subpart. All new personnel, those hired after the compliance date of the standard, shall be trained upon hiring. All existing personnel, those hired before the compliance date of the standard, shall be trained within six months of the compliance date of the standard. All personnel shall be given refresher training annually. The owner or operator of the spray paint area B-1 shall maintain a copy of the training program with the work practice implementation plan. The training program shall include, at a minimum, the following:

(1) A list of all current personnel by name and job description that are required to be trained;

(2) An outline of the subjects to be covered in the initial and refresher training for each position or group of personnel;

(3) Lesson plans for courses to be given at the initial and the annual refresher training that include, at a minimum, appropriate application techniques, appropriate cleaning and washoff procedures, appropriate equipment setup and adjustment to minimize finishing material usage and overspray, and appropriate management of cleanup wastes; and

(4) A description of the methods to be used at the completion of initial or refresher training to demonstrate and document successful completion.

(c) The owner or operator of the spray paint area B-1 shall prepare and maintain with the work practice implementation plan a written leak inspection and maintenance plan that specifies:

(1) A minimum visual inspection frequency of once per month or all equipment used to transfer or apply coatings, adhesives, or organic solvents;

(2) An inspection schedule;

(3) Methods for documenting the date and results of each inspection and any repairs that were made;

(4) The time frame between identifying the leak and making the repair, which adheres, at a minimum, to the following schedule:

(I) A first attempt at repair (e.g., tightening of packing glands) shall be made no later than five calendar days after the leak is detected; and

(ii) Final repairs shall be made within 15 calendar days after the leak is detected, unless the leaking equipment is to be replaced by a new purchase, in which case repairs shall be completed within three months.

(d) The owner or operator of the spray paint area B-1 shall develop an organic solvent accounting form to record:

(1) The quantity and type of organic solvent used each month for washoff and cleaning, as defined in § 63.801 of this subpart;

(2) The number of pieces washed off, and the reason for the washoff; and

(3) The quantity of spent solvent generated from each washoff and cleaning operation each month, and whether it is recycled onsite or disposed offsite.

(e) The owner or operator of the spray paint area B-1 shall not use cleaning or washoff solvents that contain any of the pollutants listed in Table 4 to this subpart, in concentrations subject to MSDS reporting as required by OSHA.

(f) The owner or operator of the spray paint area B-1 shall not use compounds containing more than 8.0 percent by weight of VOC for cleaning spray booth components other than conveyors, continuous coaters and their enclosures, or metal filters, unless the spray booth is being refurbished. If the spray booth is being refurbished, that is the spray booth coating or other protective material used to cover the booth is being replaced, the spray paint booth B-1 shall use no more than 1.0 gallon of organic solvent per booth to prepare the surface of the booth prior to applying the booth coating.

(g) The owner or operator of the spray paint area B-1 shall use normally closed containers for storing finishing, gluing, cleaning, and washoff materials.

(h) The owner or operator of the spray paint area B-1 shall use conventional air spray guns to apply finishing materials only under any of the following circumstances:

(1) To apply finishing materials that have a VOC content no greater than 1.0 lb VOC/lb solids, as applied;

(2) For touch up and repair under the following conditions:

(I) The touch up and repair occurs after completion of the finishing operation; or

(ii) The touch up and repair occurs after the application of stain and before the application of any other type of finishing material, and the materials used for touch up and repair are applied from a container that has a volume of no more than 2.0 gallons.

(3) When spray is automated, that is, the spray gun is aimed and triggered automatically, not manually;

(4) When emissions from the finishing application station are directed to a control device;

(5) The conventional air gun is used to apply finishing materials and the cumulative total usage of that finishing material is no more than 5.0 percent of the total gallons of finishing material used during that semiannual period; or

(6) The conventional air gun is used to apply stain on a part for which it is technically or economically infeasible to use any other spray application technology. The owner or operator of the spray paint area B-1 shall demonstrate technical or economic infeasibility by submitting to the EPA and IDEM a videotape, a technical report, or other documentation that supports the facility's claim of technical or economic infeasibility. The following criteria shall be used, either independently or in combination, to support the owner or operator of spray paint area B-1's claim of technical or economic infeasibility:

(i) The production speed is too high or the part shape is too complex for one operator to coat the part and the application station is not large enough to accommodate an additional operator; or

(ii) The excessively large vertical spray area of the part makes it difficult to avoid sagging or runs in the stain.

(i) The owner or operator of the spray paint area B-1 shall pump or drain all organic solvent used for line cleaning into a normally closed container.

(j) The owner or operator of the spray paint area B-1 shall collect all organic solvent used to clean spray guns into a normally closed container.

(k) The owner or operator of the spray paint area B-1 shall control emissions from washoff operations by:

(1) Using normally closed tanks for washoff; and

(2) Minimizing dripping by tilting or rotating the part to drain as much solvent as possible.

(l) The owner or operator of the spray paint area B-1 shall prepare and maintain with the work practice implementation plan a formulation assessment plan that:

(1) Identifies VHAP from the list presented in Table 5 of the 40 CFR 63 Part JJ that are being used in finishing operations by the facility;

(2) Establishes a baseline level of usage by the spray paint area B-1, for each VHAP identified in paragraph h (l)(1) of this section. The baseline usage level shall be the highest annual usage from 1994, 1995, or 1996, for each VHAP identified in paragraph (l)(1) of this section. For formaldehyde, the baseline level of usage shall be based on the amount of free formaldehyde present in the finishing material when it is applied. For styrene, the baseline level of usage shall be an estimate of unreacted styrene, which shall be calculated by multiplying the amount of styrene monomer in the finishing material, when it is applied, by a factor of 0.16. Sources using a control device to reduce emissions may adjust their usage based on the overall control efficiency of the control system, which is determined using the equation in § 63.805 (d) or (e).

(3) Tracks the annual usage of each VHAP identified in (l)(1) by the paint area that is present in amounts subject to MSDS reporting as required by OSHA.

(4) If, after November 1998, the annual usage of the VHAP identified in paragraph (l)(1) exceeds its baseline level, then the owner or operator of the spray paint area B-1 shall provide a written notification to the permitting authority that describes the amount of the increase and explains the reasons for exceedance of the baseline level. The following explanations would relieve the owner or operator from further action, unless the facility is not in compliance with any State regulations or requirements for that VHAP:

(i) The exceedance is no more than 15.0 percent above the baseline level;

(ii) Usage of the VHAP is below the de minimis level presented in Table 5 of 40 CFR 63 Part JJ subpart for that VHAP (sources using a control device to reduce emissions may adjust their usage based on the overall control efficiency of the control system, which is determined using the procedures in § 63.805 (d) or (e);

(iii) The spray paint area B-1 are in compliance with its State's air toxic regulations or guidelines for the VHAP; or

(iv) The source of the pollutant is a finishing material with a VOC content of no more than 1.0 kg VOC/kg solids (1.0 lb VOC/lb solids), as applied.

(5) If none of the above explanations are the reason for the increase, the owner or operator shall confer with the permitting authority to discuss the reason for the increase and whether there are practical and reasonable technology-based solutions for reducing the usage. The evaluation of whether a technology is reasonable and practical shall be based on cost, quality, and marketability of the product, whether the technology is being used successfully by other wood furniture manufacturing operations, or other criteria mutually agreed upon by the permitting authority and owner or operator. If there are no practical and reasonable solutions, the source need take no further action. If there are solutions, the owner or operator shall develop a plan to reduce usage of the pollutant to the extent feasible. The plan shall address the approach to be used to reduce emissions, a timetable for implementing the plan, and a schedule for submitting notification of progress.

(6) If after November 1998, an affected source uses a VHAP of potential concern for which a baseline level has not been previously established, then the baseline level shall be established as the de minimis level, based on 70 year exposure levels and data provided in the proposed rulemaking pursuant to Section 112(g) of the CAA, for that pollutant. A list of VHAP of potential concern is provided in Table 6 of 40 CFR 63 Part JJ. If usage of the VHAP of potential concern exceeds the de minimis level, then the source shall provide an explanation to the permitting authority that documents the reason for exceedance of the de minimis level. If the explanation is not one of those listed in paragraphs (l)(4)(I) through (l)(4)(iv), the source shall follow the procedures established in (l)(5).

D.1.6 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and any control devices.

**Compliance Determination Requirements**

D.1.7 Performance Test Methods [326 IAC 14][40 CFR Part 63.805]

(a) The EPA Method 311 of Appendix A of part 63 shall be used in conjunction with formulation data to determine the VHAP content of the liquid coating in the spray area B-1. Formulation data shall be used to identify VHAP present in the coating. The EPA Method 311 shall then be used to quantify those VHAP identified through formulation data. The EPA Method 311 shall not be used to quantify HAP such as styrene and formaldehyde that are emitted during the cure.

(b) The EPA Method 24 (40 CFR part 60, Appendix A) shall be used to determine the solids content by weight and the density of coatings in the spray area B-1. If it is demonstrated to the satisfaction of the EPA and IDEM that a coating does not release VOC or HAP byproducts during the cure, for example, all VOC and HAP present in the coating is solvent, then batch formulation information shall be accepted.

(c) The owner or operator of the spray area B-1 may request approval from the EPA and IDEM to use an alternative method for determining the VHAP content of the coating.

(d) In the event of any inconsistency between the EPA Method 24 or Method 311 test data and the spray area B-1 formulation data, that is, if the EPA Method 24/311 value is higher, the EPA Method 24/311 test shall govern unless after consultation, a regulated source could demonstrate to the satisfaction of the enforcement agency that the formulation data were correct. Sampling procedures shall follow the guidelines presented in “Standard Procedures for Collection of Coating and Ink Samples for VOC Content Analysis by Reference Method 24 and Reference Method 24A” EPA-340/1-91-010. (Docket No. A-93-10, Item No. IV-A-1).

D.1.8 VOC Emissions

Compliance with Condition D.1.1 shall be demonstrated at the end of each month based on the total volatile organic compound usage for the most recent twelve (12) month period.

**Compliance Monitoring Requirements**

D.1.9 Particulate Matter (PM)

The dry filters for particulate matter overspray control shall at all times be in place when the spray paint area B-1 is in operation.

D.1.10 Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the dry filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray while the spray paint area B-1 is in operation. During periods of inclement weather, observations will be performed weather permitting. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(b) Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an overspray emission, evidence of overspray emission, or other abnormal emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

D.1.11 Compliance Procedures and Monitoring Requirements [326 IAC 14] [40 CFR Part 63.804]

(a) The owner or operator of the spray paint area B-1 shall comply with the Condition D.1.3 provisions by using the following methods:

Use compliant finishing materials according to the following criteria:

(i) Demonstrate that each sealer and topcoat has a VHAP content of no more than 0.8 kg VHAP/kg solids (0.8 lb VHAP/lb solids), as applied, each stain has a VHAP content of no more than 1.0 kg VHAP/kg solids (1.0 lb VHAP/lb solids), as applied, and each thinner contains no more than 10.0 percent VHAP by weight;

(ii) Demonstrate that each washcoat, base coat, and enamel that is purchased pre-made, that is, it is not formulated onsite by thinning another finishing material, has a VHAP content of no more than 0.8 kg VHAP/kg solids (0.8

lb VHAP/lb solids), as applied, and each thinner contains no more than 10.0 percent VHAP by weight; and

(iii) Demonstrate that each wash coat, base coat, and enamel that is formulated onsite is formulated using a finishing material containing no more than 0.8 kg VHAP/kg solids (0.8 lb VHAP/lb solids) and a thinner containing no more than 3.0 percent HAP by weight.

(b) The owner or operator of the spray paint area B-1 that are complying through the procedures established (a)(1) and are applying coatings using continuous coaters shall demonstrate initial compliance by:

(1) Submitting an initial compliance status report, as required by § 63.807(b), stating that compliant coatings, as determined by the VHAP content of the coating in the reservoir and the VHAP content as calculated from records, and compliant thinners are being used; or

(2) Submitting an initial compliance status report, as required by § 63.807(b), stating that compliant coatings, as determined by the VHAP content of the coating in the reservoir, are being used; the viscosity of the coating in the reservoir is being monitored; and compliant thinners are being used. The affected source shall also submit data that demonstrate that viscosity is an appropriate parameter for demonstrating compliance.

(c) The owner or operator of the paint booth in Condition D.1.3, shall submit an initial compliance status report, as required by § 63.807(b), stating that the work practice implementation plan has been developed and procedures have been established for implementing the provisions of the plan.

(d) The owner or operator of the paint booth that is complying through the procedures established in § 63.804 (d)(2) and are applying coatings using continuous coaters shall demonstrate continuous compliance by following the procedures:

(1) Using compliant coatings, as determined by the VHAP content of the coating in the reservoir and the VHAP content as calculated records, using compliant thinners, and submitting a compliance certification with the semiannual report required by § 63.807(c).

(2) The compliance certification shall state that compliant coatings have been used each day in the semiannual reporting period, or should otherwise identify the days of noncompliance and the reasons for noncompliance. The spray paint area B-1 is in violation of the standard whenever a noncompliant coating, as determined by records or by a sample of the coating, is used. Use of a noncompliant coating is a separate violation for each day the noncompliant coating is used.

(3) The compliance certification shall be signed by a responsible official of the company that owns or operates the spray paint area B-1.

**Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

D.1.12 Record Keeping Requirements [326 IAC 14][40 CFR Part 63.806]

(a) To document compliance with Condition D.1.1(c), the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.1(c).

(1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(2) A log of the months of use;

(3) The cleanup solvent usage for each month;

(4) The total VOC usage for each month; and

(5) The weight of VOCs emitted for each compliance period.

(b) To document compliance with Condition D.1.4, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

(c) The owner or operator of the spray paint area B-1 shall fulfill all record keeping requirements of § 63.10 of subpart A, according to the applicability criteria in § 63.800(d) of this subpart.

(d) The owner or operator of the spray paint area B-1 subject to the emission limits in Condition D.1.3 of this permit shall maintain records of the following:

(1) A certified product data sheet for each finishing material, thinner, contact adhesive, and strippable spray booth coating subject to the emission limits in § 63.802; and

(2) The VHAP content, in kg VHAP/kg solids (lb VHAP/lb solids), as applied, of each finishing material and contact adhesive subject to the emission limits in § 63.802; and

(3) The VOC content, in kg VOC/kg solids (lb VOC/lb solids), as applied, of each strippable booth coating subject to the emission limits in § 63.802 (b)(3).

(e) The owner or operator of the spray paint area B-1 shall maintain onsite the work practice implementation plan and all records associated with fulfilling the requirements of that plan, including, but not limited to:

(1) Records demonstrating that the operator training program required by § 63.803(b) is in place;

(2) Records collected in accordance with the inspection and maintenance plan required by § 63.803(c);

(3) Records associated with the cleaning solvent accounting system required by § 63.803(d);

(4) Records associated with the limitation on the use of conventional air spray guns showing total finishing material usage and the percentage of finishing materials applied with conventional air spray guns for each semiannual period as required by § 63.803(h)(5).

(5) Records associated with the formulation assessment plan required by § 63.803(l);

and

(6) Copies of documentation such as logs developed to demonstrate that the other provisions of the work practice implementation plan are followed.

(f) The owner or operator of the spray paint area B-1 subject to the emission limits in D.1.3 and following the compliance provisions of § 63.804(f) (3), and § 63.804(g)(3)(I), shall maintain records of the compliance certifications submitted in accordance with § 63.807(c) for each semiannual period following the compliance date.

(g) The owner or operator of the spray paint area B-1 shall maintain records of all other information submitted with the compliance status report required by § 63.9(h) and § 63.807(b) and the semiannual reports required by § 63.807(c).

(h) The owner or operator of the spray paint area B-1 shall maintain all records in accordance with the requirements of § 63.10(b)(1).

(i) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.13 Reporting Requirements [326 IAC 14] [40 CFR Part 63.807]

(a) A quarterly summary of the information to document compliance with Condition D.1.1(c), shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

(b) The owner or operator of the spray paint area B-1 subject to this subpart shall fulfill all reporting requirements of § 63.7 through § 63.10 of subpart A (General Provisions) according to the applicability criteria in § 63.800(d) of this subpart.

(c) The owner or operator of the spray paint area B-1 demonstrating compliance in accordance with § 63.804(f) (3) shall submit the compliance status report required by § 63.9(h) of subpart A (General Provisions) no later than 60 days after the compliance date. The report shall include the information required by § 63.804(f) (3) of this subpart and submitted to the address listed in Section C - General Reporting Requirements, of this permit.

(d) The owner or operator of the spray paint area B-1 demonstrating compliance in accordance with § 63.804(g) (3) shall submit a report covering the previous 6 months of wood furniture manufacturing operations:

(1) The first report shall be submitted 30 calendar days after the end of the first 6-month period following the compliance date.

(2) Subsequent reports shall be submitted 30 calendar days after the end of each 6-month period following the first report.

(3) The semiannual reports shall include the information required by § 63.804(g) (3), a statement of whether the affected source was in compliance or noncompliance, and, if the affected source was in noncompliance, the measures taken to bring the affected source into compliance.

(4) The frequency of the reports required by paragraph (c) of this section shall not be reduced from semiannually regardless of the history of the owner's or operator's compliance status.

The report shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit.

**SECTION D.2 FACILITY OPERATION CONDITIONS**

Facility Description [326 IAC 2-7-5(15)]:

Two (2) high volume low pressure (HVLP) spray applications for coating recreational vehicles/motor homes in each downdraft paint booth identified as B-2a and B-2b, each with a maximum capacity of one (1) recreational vehicle per hour, dry filters for the particulate matter overspray control, each booth exhausting to two separate stacks identified as SV2-3a, SV2-3b and SV2-4a, SV2-4b respectively. (1998)

**Emission Limitations and Standards [326 IAC 2-7-5(1)]**

D.2.1 BACT Determination [326 IAC 8-1-6]

Pursuant to 326 IAC 8-1-6 and CP#039-9230-00157, issued on June 18, 1998, the input VOC of the coatings (primer, base, top and clear coats, cleaning solvents) in the paint booths B-2a and B-2b are limited to 70 tons of VOC per year, rolled on a monthly basis, for the two (2) combined emission units.

D.2.2 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3 (Process Operations), the following facilities shall have a PM allowable emissions using the following equation:

$$E = 4.10\ P^{0.67}$$

where: E = PM allowable emissions in pounds per hour
P = Process weight rate in tons per hour

D.2.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and any control devices.

**Compliance Determination Requirements**

D.2.4 Testing Requirements [326 IAC 8-1-4]

Testing of the facilities identified as B-2a and 2b are not specifically required by this permit. However, if testing is required, compliance with the VOC limit specified in Condition D.2.1 shall be determined using a performance test conducted in accordance with Section C - Performance Testing.

D.2.5 VOC Emissions

Compliance with Condition D.2.1 shall be demonstrated at the end of each month based on the total volatile organic compound usage for the most recent twelve (12) month period.

**Compliance Monitoring Requirements**

D.2.6 Particulate Matter (PM)

The dry filters for particulate matter overspray control shall at all times be in place when paint booths identified as B- 2a and 2b are in operation.

D.2.7 Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the dry filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray while the booths identified as B- 2a and 2b are in operation. During periods of inclement weather, observations will be performed weather permitting. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(b) Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an overspray emission, evidence of overspray emission, or other abnormal emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

**Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

D.2.8 Record Keeping Requirements

(a) To document compliance with Conditions D.2.1, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.2.1.

(1) The amount of VOC and HAP content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(2) A log of the months of use;

(3) The cleanup solvent usage for each month;

(4) The total VOC usage for each month;

(5) The total HAP usage for each month;

(6) The weight of VOC and HAPs emitted for each compliance period.

(b) To document compliance with Condition D.2.2, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.2.9 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.2.1, shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

**SECTION D.3 FACILITY OPERATION CONDITIONS**

Facility Description [326 IAC 2-7-5(15)]
EU-03 (Frames), One (1) Spray Paint Booth B-3, equipped with two (2) high volume low pressure (HVLP) spray application for coating metal frames, identified as EU-03 (Frame Shop), with a maximum capacity of four (4) frames per hour, using dry filters as particulate matter overspray control, and exhausting to stack SV-3. (1990)

**Emission Limitations and Standards [326 IAC 2-7-5(1)]**

D.3.1 Volatile Organic Compounds (Miscellaneous Metal Coatings) [326 IAC 8-2-9] [326 IAC 2-2]

(a) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations) and CP# 039-9230-00157, issued on June 18, 1998, the volatile organic compound (VOC) content of coatings applied to metal frames in the paint booth identified as B-3 shall be limited to:

| Coatings | Limit (pounds of VOC/gallon of coating less water delivered to the applicator) |
|---|---|
| Extreme Performance Coat | 3.50 |

(b) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations) and CP# 039-9230-00157, issued on June 18, 1998, solvent sprayed from the application equipment during clean up or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

(c) The input VOC to the Spray Paint Booth B-3 and the usage of cleanup solvent for the Spray Paint Booth B-3 (the usage of cleanup solvent may need to take into account any recycling of cleanup rags or reused solvent), in combination with input VOC from Spray Booth B-1, FRP Booth, and insignificant activities, shall be limited to < 156 tons per 12 consecutive month period. This limitation will prevent the VOC emissions from the entire source to less than 250 tons per year and make 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

D.3.2 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3 (Process Operations), the paint booth identified as B-3 shall have a PM allowable emissions using the following equation:

$$E = 4.10\ P^{0.67}$$

where E = PM allowable emissions in pounds per hour
P = Process weight rate in tons per hour

D.3.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and any control devices.

**Compliance Determination Requirements**

D.3.4 Volatile Organic Compounds

Compliance with the VOC content and usage limitations contained in Conditions D.3.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3)(A) and 326 8-1-2 (a) (7) using formulation data supplied by the coating manufacturer. However, IDEM, OAM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.3.5 VOC Emissions

Compliance with Condition D.3.1(c) shall be demonstrated at the end of each month based on the total volatile organic compound usage for the most recent twelve (12) month period.

**Compliance Monitoring Requirements**

D.3.6 Particulate Matter (PM)

The dry filters for particulate matter overspray control shall at all times be in place when the paint booth identified as B-3 is in operation.

D.3.7 Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the dry filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stack while one or more of the booths are in operation. During periods of inclement weather, observations will be performed weather permitting. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(b) Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an overspray emission, evidence of overspray emission, or other abnormal emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

**Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

D.3.8 Record Keeping Requirements

(a) To document compliance with Condition D.3.1, the Permittee shall maintain records in accordance with (1) through (7) below. Records maintained for (1) through (7) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.3.1.

(1) The amount of VOC and HAP content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(2) A log of the months of use;

(3) The cleanup solvent usage for each month;

(4) The volume weighted VOC content of the coatings used for each day that any coating with VOC content greater than 3.5 pounds per gallon, less water, is used, by:

$$A = 3(C * U) / 3U \quad \# \text{ 3.5 lb VOC/gal}$$

A = Daily volume weighted average in pounds VOC per gallon
C = VOC content of coating in pounds VOC per gallon
U = usage rate of coating in gallons per day

(5) The total VOC usage for each month;

(6) The total HAP usage for each month;

(7) The weight of VOC and HAPs emitted for each compliance period.

(b) To document compliance with Condition D.3.2, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.3.9 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.3.1(c), shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

**SECTION D.4 FACILITY OPERATION CONDITIONS**

Facility Description [326 IAC 2-7-5(15)]:
EU-04 (Adhesives), One (1) Spray Paint Booth B-4, equipped with two (2) HVLP spray guns, identified as EU-04 (Adhesive Booth), with a maximum capacity of four (4) units per hour, using dry filters as control, and exhausting to stacks SV4-1 and SV4-2. (1983)

**Emission Limitations and Standards [326 IAC 2-7-5(1)]**

D.4.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the surface coatings applied to wood substrates shall be applied with high volume low pressure (HVLP) or airless spray guns. HVLP spray application is an accepted alternative method of application for Air Assisted Airless Spray Application. HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

D.4.2 BACT Minor Limit [326 IAC 8-1-6]

The water-based adhesive spray booth, identified as EU-04, is not subject to 326 IAC 8-1-6. However, any change or modification which may increase VOC potential emissions to 25 tons per year from the booth shall require prior approval from the OAM to determine applicability requirements of 326 IAC 8, before such change may occur.

D.4.3 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to this rule, the PM from the spray paint booth B-4, identified as EU-04, shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10\ P^{0.67}$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

D.4.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

**Compliance Determination Requirements**

D.4.5 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.4.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

**Compliance Monitoring Requirements**

D.4.6 Particulate Matter (PM)

The dry filters for PM control shall be in operation at all times when the Spray Paint Booth B-4 is in operation.

D.4.7 Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the dry filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks (SV-92 and SV-93) while the booth is in operation. During periods of inclement weather, observations will be performed weather permitting. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(b) Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an overspray emission, evidence of overspray emission, or other abnormal emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

**Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

D.4.8 Record Keeping Requirements

(a) To document compliance with Condition D.4.3, the Permittee shall maintain a log of weekly overspray observations, daily, and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

(b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

**SECTION D.5 FACILITY OPERATION CONDITIONS**

Facility Description [326 IAC 2-7-5(15)]:
EU-05 (FRP), One (1) FRP Booth (seam work on special orders), identified as EU-05 (Resin Repair Booth), equipped with three (3) high volume low pressure (HVLP) spray and hand lay up application for coating fiberglass touch up and repair operation, with a maximum capacity of 0.12 units per hour, using dry filters for particulate matter overspray control, and exhausting to stack SV-5. (1995)

**Emission Limitations and Standards [326 IAC 2-7-5(1)]**

D.5.1 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3 (Process Operations), the FRP Booth, identified as EU-05, shall have a PM allowable emissions using the following equation:

$$E = 4.10\ P^{0.67}$$

Where: E = PM allowable emissions in pounds per hour
P = Process weight rate in tons per hour

D.5.2 Volatile Organic Compound (VOC) [326 IAC 8-1-6] [326 IAC 2-2]

(a) The FRP Booth, identified as EU-05, is not subject to 326 IAC 8-1-6. However, any change or modification which may increase VOC potential emissions to 25 tons per year from the FRP booth, shall require prior approval from the OAM to determine applicability requirements of 326 IAC 8, before such change may occur.

(b) The input VOC to the FRP Booth and the usage of cleanup solvent for the FRP Booth (the usage of cleanup solvent may need to take into account any recycling of cleanup rags or reused solvent), in combination with input VOC from Spray Paint Booths B-1 and B-3 and insignificant activities, shall be limited to < 156 tons per 12 consecutive month period. This limitation will prevent the VOC emissions from the entire source to less than 250 tons per year and make 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

**Compliance Determination Requirements**

D.5.3 Testing Requirements

The Permittee is not required to test the FRP Booth, identified as EU-05, by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.5.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.5.4 VOC Emissions

Compliance with Condition D.5.2(b) shall be demonstrated at the end of each month based on the total volatile organic compound usage for the most recent month.

**Compliance Monitoring Requirements**

D.5.5 Particulate Matter (PM)

The dry filters for particulate matter overspray control shall at all times be in place when the FRP Booth, identified as EU-05, is in operation.

D.5.6 Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the dry filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stack (B-4) while the FRP Booth is in operation. During periods of inclement weather, observations will be performed weather permitting. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(b) Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an overspray emission, evidence of overspray emission, or other abnormal emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

**Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

D.5.7 Record Keeping Requirements

(a) To document compliance with Condition D.5.2, the Permittee shall maintain records in accordance with (1) through (3) below.

(1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(2) The cleanup solvent usage for each month;

(3) The total VOC usage for each month; and

(b) To document compliance with Condition D.5.1, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.5.8 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.5.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

**SECTION D.6 FACILITY OPERATION CONDITIONS**

Facility Description [326 IAC 2-7-5(15)]:
EU-06 (R&D, Service and Warranty), One (1) spray paint booth ® & D), equipped with one (1) air atomized spray gun for fiberglass mold coating, with a production rate of 0.0031 unit per hour, located at the Research and Development Center. (1996)
- Two (2) spray coating booths, identified as BR-1 and BR-2, equipped with HVLP spray guns, using dry filters for overspray control, and exhausting at two (2) stacks, identified as SV6-1 and SV6-2. These booths have not been installed yet. When these are installed, the proper notification will be submitted to IDEM. (1998)

**Emission Limitations and Standards [326 IAC 2-7-5(1)]**

D.6.1 BACT Minor Limit [326 IAC 8-1-6]

The VOC input to the fiberglass coating operations performed by the two (2) spray coating booths, identified as BR-1 and BR-2, shall be limited to two (2) tons per calendar month (twenty-four (24) tons of VOC per year). Therefore, the Best Available control Technology (BACT) requirements of 326 IAC 8-1-6 will not apply. Any change or modification which may alter the fiberglass coating operations such that allowable VOC emissions will increase to 25 tons per year or greater, shall obtain a permit modification pursuant to 326 IAC 8-1-6 before such change may occur.

D.6.2 Volatile Organic Compound (VOC)

The spray paint booth, located at the Research and Development Center, is not subject to 326 IAC 8-1-6. However, any change or modification which may increase VOC potential emissions to 25 tons per year from the spray paint booth, located at the Research and Development Center, shall require prior approval from the OAM to determine applicability requirements of 326 IAC 8, before such change may occur.

D.6.3 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2 (Process Operations), the PM from the spray booths identified as BR-1 and BR-2, and the spray paint booth located at the Research and Development Center shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10\ P^{0.67}$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

D.6.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and any control devices.

**Compliance Determination Requirements**

D.6.5 Volatile Organic Compounds (VOC)

Compliance with the VOC usage limitation contained in Condition D.6.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3)(A) and 326 IAC 8-1-2(a)(7) using formulation data supplied by the coating manufacturer. IDEM, OAM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.6.6 Particulate Matter (PM)

The dry filters for PM control shall be in operation at all times when the two (2) spray coating booths (BR-1 and BR-2) are in operation.

D.6.7 VOC Emissions

Compliance with Condition D.6.1 shall be demonstrated at the end of each month based on the total volatile organic compound usage for the most recent month.

**Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

D.6.8 Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booths stacks (BR-1 and BR-2) while one or more of the booths are in operation. During periods of inclement weather, observations will be performed weather permitting. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an overspray emission, evidence of overspray emission, or other noticeable change in overspray emissions is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

**Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

D.6.9 Record Keeping Requirements

(a) To document compliance with Conditions C.1, D.6.1 and D.6.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and VOC emission limits established in Conditions D.6.1 and D.6.2.

(1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and EPA VOC Data Sheets necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(2) A log of the dates of use;

(3) The cleanup solvent usage for each month;

(4) The total VOC usage for each month; and

(5) The weight of VOCs emitted for each compliance period.

(b) To document compliance with Condition D.6.3, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.6.10 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.6.1 and D.6.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. This summary report shall include the monthly VOC emitted and a daily record of the number of recreational vehicles processed.

**SECTION D.7 FACILITY OPERATION CONDITIONS**

Facility Description [326 IAC 2-7-5(15)]:
EU-07 (Woodworking), One (1) woodworking shop equipped with woodworking equipment, located in Building 3, using one (1) baghouse as control and exhausting internally (located at North Delaware Street). One (1) woodworking shop equipped with woodworking equipment, with a wood usage of 61 pounds per hour, attached to a portable dust collector as particulate control, exhausted internally, located at Research and Development Center. (1996)
One (1) woodworking and machining shop equipped with woodworking and metalworking equipment, with one table saw attached to a portable dust collector as particulate control, exhausted internally, with a maximum capacity of sixty (60) pounds per hour wood, ten (10) pounds per hour plastic and fiberglass, and twelve (12) pounds per hour steel processing capacity (located at Service and Repair Center).

**Emission Limitations and Standards [326 IAC 2-7-5(1)]**

D.7.1 Particulate Matter (PM) [326 IAC 6-3]

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the woodworking facility located at North Delaware Street shall not exceed 13.37 pounds per hour when operating at a process weight rate of eleven-thousand six-hundred and seventy (11,670) pounds per hour.

Pursuant to 326 IAC 6-3-2 (Process Operations), the PM emissions from the woodworking and machining operations located at the Service and Repair Center shall not exceed the allowable particulate matter (PM) emission rate of 0.551 pounds per hour when operating at a process weight rate of eighty-two (82) pounds per hour.

Pursuant to 326 IAC 6-3-2 (Process Operations), the PM emissions from the woodworking and machining operations located at the Research and Development Center shall not exceed the allowable particulate matter (PM) emission rate of 0.551 pounds per hour when operating at a process weight rate of sixty-one (61) pounds per hour.

| Location | P (tons/hour) | E (lbs/hour) |
|---|---|---|
| North Delaware Street | 5.835 | 13.37 |
| Service and Repair Center | 0.041 | 0.551 |
| Research and Development Center | 0.03 | 0.551 |

The pounds per hour limitation was calculated with the following equation:

$$E = 4.10\ P^{0.67}$$

where E = rate of emission in pounds per hour
P = process weight rate in tons per hour

The PM emissions rate for a maximum process rate of less than 100 pounds per hour shall not exceed the allowable particulate matter (PM) emission rate of 0.551 pounds per hour.

D.7.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the woodworking shop located at North Delaware Street and its control device.

**Compliance Determination Requirements**

D.7.3 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the particulate matter limits specified in Condition D.7.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.7.4 Particulate Matter (PM)

The baghouse used for PM control shall be in operation at all times when the woodworking machines located at North Delaware Street are in operation.

The portable dust collector for PM control shall be in operation at all times when the table saw located at the Service Repair Center is in operation.

The baghouse used in the woodworking shop at the Research and Development Center, shall be in operation at all times when the woodworking machines are in operation.

**Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

D.7.5 Visible Emissions Notations

(a) Daily visible emission notations of the woodworking facility located at North Delaware Street and the woodworking shop located at Research and Development Center stacks exhaust shall be performed during normal daylight operations when exhausting to the outside atmosphere. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

D.7.6 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouse used in conjunction with the woodworking shop, at least once weekly when the woodworking shop is in operation when venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouse shall be maintained within the range of 3.0 and 6.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAM, and shall be calibrated at least once every six (6) months.

D.7.7 Broken or Failed Bag Detection

In the event that bag failure has been observed:

(a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

(b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

**Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

D.7.8 Record Keeping Requirements

(a) To document compliance with Condition D.7.5, the Permittee shall maintain records of daily visible emission notations of the woodworking facility (located at North Delaware Street) and the woodworking shop (located at Research and Development Center) stacks exhaust when exhausting to the outside atmosphere.

(b) To document compliance with Condition D.7.6, the Permittee shall maintain the following:

(1) Daily records of the following operational parameters during normal operation when venting to the atmosphere:

Inlet and outlet differential static pressure.

(2) Documentation of all response steps implemented, per event .

(3) Operation and preventive maintenance logs, including work purchases orders, shall be maintained.

(4) Quality Assurance/Quality Control (QA/QC) procedures.

(5) Operator standard operating procedures (SOP).

(6) Manufacturer's specifications or its equivalent.

(7) Equipment "troubleshooting" contingency plan.

(8) Documentation of the dates vents are redirected.

(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements of this permit.

**SECTION D.8 FACILITY OPERATION CONDITIONS**
**INSIGNIFICANT ACTIVITIES**

Welding and Degreasing Operations

**Emission Limitations and Standards [326 IAC 2-7-5(1)]**

D.8.1 Particulate Matter (PM) [326 IAC 6-3]

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the welding operations shall not exceed allowable PM emission rate based on the following equation:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10\ P^{0.67}$$

where E = rate of emission in pounds per hour
P = process weight rate in tons per hour

D.8.2 Volatile Organic Compounds (VOC)

(a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaner degreaser facility shall ensure that the following control equipment requirements are met:

(1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:

(A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38$^{O}$C) (one hundred degrees Fahrenheit (100$^{O}$F));

(B) The solvent is agitated; or

(C) The solvent is heated.

(2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38$^{O}$C) (one hundred degrees Fahrenheit (100$^{O}$F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.

(3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).

(4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.

(5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38$^{O}$C) (one hundred degrees Fahrenheit (100$^{O}$F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9$^{O}$C) (one hundred twenty degrees Fahrenheit (120$^{O}$F)):

(A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.

(B) A water cover when solvent is used is insoluble in, and heavier than, water.

(C) Other systems of demonstrated equivalent control such as a refrigerated chiller of carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.

(b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility shall ensure that the following operating requirements are met:

(1) Close the cover whenever articles are not being handled in the degreaser.

(2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.

(3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

**Compliance Determination Requirements**

D.8.3 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the particulate matter limits specified in Condition D.8.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
# OFFICE OF AIR MANAGEMENT
# COMPLIANCE DATA SECTION

## PART 70 OPERATING PERMIT CERTIFICATION

Source Name: Newmar Corporation
Source Address: 355 North Delaware Street, Nappanee, Indiana 46550-0030
Mailing Address: P.O. Box 30, Nappanee, Indiana 46550-0030
Part 70 Permit No.: T039-7571-00157

**This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.**

Please check what document is being certified:

**9** Annual Compliance Certification Letter

**9** Test Result (specify) _____

**9** Report (specify) _____

**9** Notification (specify) _____

**9** Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
# OFFICE OF AIR MANAGEMENT
## COMPLIANCE DATA SECTION

**P.O. Box 6015**
**100 North Senate Avenue**
**Indianapolis, Indiana 46206-6015**
**Phone: 317-233-5674**
**Fax: 317-233-6865**

## PART 70 OPERATING PERMIT
## EMERGENCY/DEVIATION OCCURRENCE REPORT

Source Name: Newmar Corporation
Source Address: 355 North Delaware Street, Nappanee, Indiana 46550-0030
Mailing Address: P.O. Box 30, Nappanee, Indiana 46550-0030
Part 70 Permit No.: T039-7571-00157

**This form consists of 2 pages** **Page 1 of 2**

| Check either No. 1 or No.2 |
|---|
| 9 1. This is an emergency as defined in 326 IAC 2-7-1(12)<br>C The Permittee must notify the Office of Air Management (OAM), within four (**4**) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and<br>C The Permittee must submit notice in writing or by facsimile within two (**2**) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16 |
| 9 2. This is a deviation, reportable per 326 IAC 2-7-5(3)(c)<br>C The Permittee must submit notice in writing within ten (**10**) calendar days |

If any of the following are not applicable, mark N/A

| |
|---|
| Facility/Equipment/Operation: |
| Control Equipment: |
| Permit Condition or Operation Limitation in Permit: |
| Description of the Emergency/Deviation: |
| Describe the cause of the Emergency/Deviation: |

If any of the following are not applicable, mark N/A **page 2 of 2**

| |
|---|
| Date/Time Emergency/Deviation started: |
| Date/Time Emergency/Deviation was corrected: |
| Was the facility being properly operated at the time of the emergency/deviation? Y N<br>Describe: |
| Type of Pollutants Emitted: TSP, PM-10, $SO_2$, VOC, $NO_X$, CO, Pb, other: |
| Estimated amount of pollutant(s) emitted during emergency/deviation: |
| Describe the steps taken to mitigate the problem: |
| Describe the corrective actions/response steps taken: |
| Describe the measures taken to minimize emissions: |
| If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value: |

Form Completed by: _____
Title / Position: _____
Date: _____
Phone: _____

# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
# OFFICE OF AIR MANAGEMENT
# COMPLIANCE DATA SECTION

## Part 70 Quarterly Report

Source Name: Newmar Corporation
Source Address: 355 North Delaware Street, Nappanee, Indiana 46550-0030
Mailing Address: P.O. Box 30, Nappanee, Indiana 46550-0030
Part 70 Permit No.: T039-7571-00157
Facility: Entire Source
Parameter: VOC emissions (tons)
Limit: < 250 tons per year

**This form consists of 2 pages** **page 1 of 2**

Month: _____

| Facility | VOC Limit (ton/year) | VOC Usage this month (tons) | VOC Usage past 11 months (tons) | Total VOC Usage past 12 months (tons) |
|---|---|---|---|---|
| Fiberglass Coating Operations BR-1 and BR-2 | 24 (2 tons per calendar month) | | | |
| Paint Booths B-2a and B-2b | 70 | | | |
| Spray Booths B-1and B-3, FRP booth, and other emissions from insignificant activities | < 156 | | | |
| **Total** | **< 250** | **-** | **-** | |

**This form consists of 2 pages** **page 2 of 2**

Month: _____

| Facility | VOC Limit (ton/year) | VOC Usage this month (tons) | VOC Usage past 11 months (tons) | Total VOC Usage past 12 months (tons) |
|---|---|---|---|---|
| Fiberglass Coating Operations BR-1 and BR-2 | 24 (2 tons per calendar month) | | | |
| Paint Booths B-2a and B-2b | 70 | | | |
| Spray Booths B-1and B-3, FRP booth, and other emissions from insignificant activities | < 156 | | | |
| **Total** | **< 250** | **-** | **-** | |

Month: _____

| Facility | VOC Limit (ton/year) | VOC Usage this month (tons) | VOC Usage past 11 months (tons) | Total VOC Usage past 12 months (tons) |
|---|---|---|---|---|
| Fiberglass Coating Operations BR-1 and BR-2 | 24 (2 tons per calendar month) | | | |
| Paint Booths B-2a and B-2b | 70 | | | |
| Spray Booths B-1and B-3, FRP booth, and other emissions from insignificant activities | < 156 | | | |
| **Total** | **< 250** | **-** | **-** | |

**9** No deviation occurred in this quarter.

**9** Deviation/s occurred in this quarter.

Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
# OFFICE OF AIR MANAGEMENT
# COMPLIANCE DATA SECTION

## Part 70 Semi-Annual Report

VOC and VHAP usage - Wood Furniture NESHAP

Source Name: Newmar Corporation
Source Address: 355 North Delaware Street, Nappanee, Indiana 46550-0030
Mailing Address: P.O. Box 30, Nappanee, Indiana 46550-0030
Part 70 Permit No.: T039-7571-00157
Facility: Entire Facility
Parameter: VOC and HAPs - NESHAP
Limit:
(1) Finishing operations - 1.0 lb VHAP/lb Solids
(2) Thinners used for on-site formulation of washcoats, basecoats and enamels - 3% VHAP content by weight
(3) All other thinner mixtures - 10% VHAP content by weight
(4) Foam adhesives meeting the upholstered seating flammability requirements - 1.8 lb VHAP/lb Solids
(5) All other contact adhesives - 1.0 lb VHAP/lb Solids
(6) Strippable spray booth material - 0.8 lb VOC/lb Solids

YEAR: _____

| Month | Finishing Operations (lb VHAP/lb Solid) | Thinner used for on-site formulation (% by weight) | All other thinner mixtures (% by weight) | Foam adhesives (upholstered) (lb VHAP/lb Solid) | Contact Adhesives (lb VHAP/lb Solid) | Strippable spray booth material (lb VOC/lb Solid) |
|---|---|---|---|---|---|---|
| 1 | | | | | | |
| 2 | | | | | | |
| 3 | | | | | | |
| 4 | | | | | | |
| 5 | | | | | | |
| 6 | | | | | | |

**9** No deviation occurred in this six month period.

**9** Deviation/s occurred in this six month period.

Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
# OFFICE OF AIR MANAGEMENT
# COMPLIANCE DATA SECTION

## PART 70 OPERATING PERMIT
## QUARTERLY COMPLIANCE MONITORING REPORT

Source Name: Newmar Corporation
Source Address: 355 North Delaware Street, Nappanee, Indiana 46550-0030
Mailing Address: P.O. Box 30, Nappanee, Indiana 46550-0030
Part 70 Permit No.: T039-7571-00157

**Months: _____ to _____ Year: _____**

This report is an affirmation that the source has met all the compliance monitoring requirements stated in this permit. This report shall be submitted quarterly. Any deviation from the compliance monitoring requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. This form can be supplemented by attaching the Emergency/Deviation Occurrence Report. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

**9** NO DEVIATIONS OCCURRED THIS REPORTING PERIOD

**9** THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD:

| Compliance Monitoring Requirement | Number of Deviations | Date of each Deviation |
|---|---|---|
| | | |
| | | |
| | | |
| | | |
| | | |
| | | |

Form Completed By: _____
Title/Position: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

# Indiana Department of Environmental Management
# Office of Air Management

## Technical Support Document (TSD) for a Part 70 Operating Permit

**Source Background and Description**

| | |
|---|---|
| **Source Name:** | Newmar Corporation |
| **Source Location:** | 355 North Delaware Street, Nappanee, Indiana 46550-0030 |
| **County:** | Elkhart |
| **SIC Code:** | 3716 and 3792 |
| **Operation Permit No.:** | T039-7571-00157 |
| **Permit Reviewer:** | KERAMIDA/RMEH |

The Office of Air Management (OAM) has reviewed a Part 70 permit application from Newmar Corporation relating to the manufacture of motor homes and travel trailers.

**Permitted Emission Units and Pollution Control Equipment**

The source consists of the following permitted emission units and pollution control devices:

a) - One (1) Spray Paint Booth B-1, equipped with six (6) high volume low pressure (HVLP) spray guns for coating of interior wood components with a maximum capacity of four (4) recreational vehicles per hour, with dry filters for the particulate matter overspray control, and exhausting to stack SV-87. (1982)
- One (1) Dip Tank, with a capacity of four (4) units per hour, exhausting to stacks SV-87 and SV-88. (1982)

b) - One (1) Spray Paint Booth B-2, equipped with five (5) HVLP spray guns, identified as EU-02 (Custom Coating), with a maximum capacity of four (4) units per hour, using dry filters as control, and exhausting to stack SV-91. (1982)
- Two (2) high volume low pressure (HVLP) spray applications for coating recreational vehicles/Motorhomes in each downdraft paint booth identified as B-2a and B-2b, each with a maximum capacity of one (1) recreational vehicle per hour, dry filters for the particulate matter overspray control, each booth exhausting to two separate stacks identified as 2a1, 2a2 and 2b1, 2b2 respectively. (1998)

c) One (1) Spray Paint Booth B-3, equipped with two (2) high volume low pressure (HVLP) spray application for coating metal frames, identified as EU-03 (Frame Shop), with a maximum capacity of four (4) frames per hour, using dry filters as particulate matter overspray control, and exhausting to stack b-3. (1990)

d) One (1) Spray Paint Booth B-4, equipped with two (2) HVLP spray guns, identified as EU-04 (Adhesive Booth), with a maximum capacity of four (4) units per hour, using dry filters as control, and exhausting to stacks SV-92 and SV-93. (1983)

e) - One (1) spray paint booth equipped with one (1) air atomized spray gun for fiberglass mold coating, with a production rate of 0.0031 unit per hour. (1996)
- Two (2) spray coating booths, identified as BR-1 and BR-2, equipped with HVLP spray guns, using dry filters for overspray control, and exhausting at two (2) stacks, identified as BR-1 and BR-2. (1998)

f) - One (1) woodworking shop equipped with woodworking equipment, located in Building 3, using one (1) baghouse as control and exhausting internally. (1981)
- One (1) woodworking shop equipped with woodworking equipment, with a wood usage of 61 pounds per hour, a dust collector is used to control the PM emissions. (1996)
- One (1) woodworking and machining shop equipped with woodworking and metalworking equipment, with one table saw attached to a portable dust collector as particulate control, exhausted internally, with a maximum capacity of sixty (60) pounds per hour wood, ten (10) pounds per hour plastic and fiberglass, and twelve (12) pounds per hour steel processing capacity. (1998)

**Unpermitted Emission Units and Pollution Control Equipment**

There are no unpermitted facilities operating at this source during this review process.

**Emission Units and Pollution Control Equipment Under Enhanced New Source Review (ENSR)**

There are no new facilities to be reviewed under the ENSR process.

**Insignificant Activities**

1) Space heaters, process heaters, or boilers using the natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour:

   a) Two (2) small natural gas fired unit heaters with a total heat input capacity of 0.475 MMBtu/hr.

   b) Fifteen (15) tube heaters and five (5) unit heaters, each with a maximum rated capacity of less than ten (10) million British thermal units per hour (MMBtu/hr).

   c) Three (3) natural gas fired air make up units identified as AMU-1 to 3, with a total rated maximum capacity of 6.75 million British thermal units per hour (MMBtu/hr).

   d) Twenty-six (26) natural gas fired air make up units identified as Fab 1 to 26, with a total rated maximum capacity of 4.58 million British thermal units per hour (MMBtu/hr).

2) A gasoline fuel transfer and dispensing operating handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons.

3) A petroleum fuel, other than gasoline, dispensing facility, having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month.

4) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.

5) The following equipment related to manufacturing activities not resulting in the emission of HAPs; brazing equipment, cutting torches, soldering equipment, welding equipment.

6) Water based adhesives that are less than or equal to 5% by volume of VOCs excluding HAPs.

7) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone.

8) Paved and unpaved roads and parking lots with public access.

9) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.

10) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.

11) Welding operations:

a) Twenty-three (23) stick welding stations using Series 60 type electrodes with a maximum consumption rate of one (1) electrode per hour per station.

b) Three (3) metal inert gas (MIG) welders with a maximum hourly consumption of wire of 0.0042 pounds per station.

c) Two (2) stick welding stations, two (2) metal inert gas (MIG) welding stations, two (2) acetylene cutting torches, and one (1) electric plasma cutter.

d) One (1) metal inert gas (MIG) and one (1) stick welding operation consisting of fifty-six (56) welding operations rated at a maximum capacity of consuming of 1.05 pound ER 70S and 0.09 pound E7018 per hour each.

12) Operations with miscellaneous VOC containing adhesives, coatings, sealants, and cleaning solvents, using roll, brush, aerosol, or squeeze bottles as application methods.

**Existing Approvals**

The source has been operating under the following approvals:

(1) CP 039-4795, issued on March 25, 1996 (North Delaware Street)

(2) CP 039-6424, issued on August 28, 1996 (Research and Development Center)

(3) CP 039-8804, issued on March 17, 1998 (Service and Repair Center)

(4) CP 039-9230, issued on June 18, 1998 (Cheyenne Avenue)

**Source Definition**

This recreational vehicle (RV) manufacturing company consists of four (4) plants:

(a) The manufacturing center is located at 355 North Delaware Street, Nappanee, Indiana.

(b) The research and development center is located at 355 North Delaware Street, Nappanee, Indiana.

(c) The service and repair center is located at 72185 CR. 3, Nappanee, Indiana.

(d) The new facility with operations in an adjacent building, is located in 1802 Cheyenne Avenue, Nappanee, Indiana.

Since the four (4) plants are located in contiguous properties, have the same SIC codes and are owned by one (1) company, they will be considered as one (1) source.

**Enforcement Issue**

There are no Enforcement actions pending.

**Recommendation**

The staff recommends to the Commissioner that the Part 70 permit be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete Part 70 permit application for the purposes of this review was received on December 13, 1996. Additional information was received on August 24, 1998.

**Emission Calculations**

The calculations submitted by the applicant have been verified and found to be accurate and correct. These calculations are provided in Appendix A of this document.

**Potential Emissions**

Pursuant to 326 IAC 1-2-55, Potential Emissions are defined as “emissions of any one (1) pollutant which would be emitted from a facility, if that facility were operated without the use of pollution control equipment unless such control equipment is necessary for the facility to produce its normal product or is integral to the normal operation of the facility.”

| Pollutant | Potential Emissions (tons/year) |
|---|---|
| PM-10 | less than 100 |
| $SO_2$ | less than 100 |
| VOC | greater than 250 |

| | |
|---|---|
| CO | less than 100 |
| $NO_x$ | less than 100 |

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

| HAP's | Potential Emissions (tons/year) |
|---|---|
| Glycol ether | less than 10 |
| Toluene | greater than 10 |
| Methanol | less than 10 |
| MEK | less than 10 |
| MIBK | greater than 10 |
| Xylene | greater than 10 |
| Naphthalene | less than 10 |
| Formaldehyde | less than 10 |
| Ethylbenzene | less than 10 |
| Methylene Chloride | greater than 10 |
| Propylene Oxide | less than 10 |
| Styrene | less than 10 |
| Methyl methacrylate | less than 10 |
| TOTAL | greater than 25 |

(a) The potential emissions (as defined in the Indiana Rule) of VOC are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

(b) The potential emissions (as defined in Indiana Rule) of any single HAP are equal to or greater than ten (10) tons per year and the potential emissions (as defined in Indiana Rule) of a combination HAPs are greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

(c) Fugitive Emissions
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

**Actual Emissions**

The following table shows the actual emissions from the source. This information reflects the 1996 emission data.

| Pollutant | Actual Emissions (tons/year) |
|---|---|
| PM-10 | 1.0065 |
| $SO_2$ | 0.0048 |
| VOC | 97.43 |
| CO | 0.16 |
| $NO_x$ | 0.80 |
| HAP | no reported |

**Limited Potential to Emit**

The table below summarizes the total limited potential to emit of the significant emission units.

| | Limited Potential to Emit (tons/year) | | | | | | |
|---|---|---|---|---|---|---|---|
| Process / facility | PM | PM-10 | $SO_2$ | VOC | CO | $NO_X$ | HAPs |
| Entire Source | - | - | - | 249 | - | - | - |
| Fiber Glass Coating Operations BR-1 and BR-2 | - | - | - | 24 (2 tons per calendar month) | - | - | - |
| Customized Top Coating Operations BR-1 and BR-2 | - | - | - | 34 vehicles per day | - | - | - |
| Paint Booths B-2, B-2a, B-2b | - | - | - | 70 tons per year | - | - | - |
| Woodworking shop (located at North Delaware Street) | 13.37 lbs/hr | - | - | - | - | - | - |
| Woodworking shop (located at Service and Repair Center) | 0.48 lbs/hr | - | - | - | - | - | - |
| Woodworking shop (located at Research and Development Center) | 0.40 lbs/hr | - | - | - | - | - | - |

**County Attainment Status**

The source is located in Elkhart County.

| Pollutant | Status |
|---|---|
| PM-10 | Unclassifiable |
| $SO_2$ | Attainment |
| $NO_2$ | Attainment |
| Ozone | Attainment |
| CO | Attainment |
| Lead | Not Designated |

Volatile organic compounds (VOC) and oxides of nitrogen ($NO_X$) are precursors for the formation of ozone. Therefore, VOC and $NO_X$ emissions are considered when evaluating the rule applicability relating to the ozone standards. Elkhart County has been designated as attainment or unclassifiable for ozone.

**Part 70 Permit Conditions**

This source is subject to the requirements of 326 IAC 2-7, pursuant to which the source has to meet the following:

(1) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.

(2) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

**Federal Rule Applicability**

(a) There are no New Source Performance Standards (326 IAC 12, 40 CFR 60) and National Emission Standards for Hazardous Air Pollutants (40 CFR 63) applicable to this facility.

(b) 40 CFR Part 63, Subpart JJ, National Emission Standards for Wood Furniture Manufacturing Operations. The woodworking operations performed in the Service and Repair Center are not covered by 40 CFR Part 63, Subpart JJ (National Emission Standards for Wood Furniture Manufacturing Operations), because the facility is not engaged in the manufacture of wood furniture components, as defined in 40 CFR 63.801.

(c) The National Emission Standards for Hazardous Air Pollutants (NESHAP) 40 CFR Part 63 Subpart JJ, (National Emission Standards for Wood Furniture Manufacturing Operations) is applicable to the facility identified as Booth -1, because this source is a major source as defined in 40 CFR Part 63.2 and it assembles objects made of solid wood and then applies various stains, sealers, lacquers, adhesives, enamels, and sealants to the wood. These operations meet the wood furniture and wood furniture component definitions in 40 CFR Part 63.801 since they qualify as “any product made of wood” or “ any part that is used in the manufacturer of wood furniture”, respectively. It does not meet the definition of incidental wood furniture since it uses more than 100 gallons per month of finishing material and adhesives. Further, the source does not qualify as an area source as specified in 40 CFR Part 63.800 (b1), (b2), or (b3). Since the source does not qualify as either an incidental wood furniture manufacturer or area source, the wood furniture and wood furniture component manufacturing and surface coating operations at Newmar Corp. are therefore subject to the requirements of 40 CFR Part 63.808, Subpart JJ” National Emissions Standards for Wood Furniture Manufacturing Operations.

**State Rule Applicability - Entire Source**

326 IAC 1-6-3 (Preventive Maintenance Plans)

Pursuant to this rule, the Permittee shall prepare and maintain a preventive maintenance plan, including the following information:

(a) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices.

(b) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions.

(c) Identification of the replacement parts which will be maintained in inventory for quick replacement.

The preventive maintenance plan shall be submitted to IDEM, OAM upon request and shall be subject to review and approval.

326 IAC 2-2 and 40 CFR 52.21 (PSD Minor Limit)

This facility shall use no more than 249 tons of VOC, including coatings, dilution solvents, and cleaning solvents, per twelve (12) consecutive month period. This usage limit is required to limit the potential to emit of VOC to not exceed 249 tons per twelve (12) consecutive month period. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than ten (10) tons per year of VOC. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by April 15 of each year and contain the minimum requirements as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

326 IAC 5-1 (Visible Emissions Limitations)

Pursuant to 326 IAC 5-1-2 (Visible Emissions Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), visible emissions shall meet the following, unless otherwise stated in this permit:

(a) Visible emissions shall not exceed an average of forty percent (40%) opacity in twenty-four (24) consecutive readings as determined by 326 IAC 5-1-4,

(b) Visible emissions shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) in a six (6) hour period.

326 IAC 6-4 (Fugitive Dust Emissions)

Pursuant to this rule, the Permittee shall be in violation of 326 IAC 6-4 (Fugitive Dust Emissions) if any of the criteria specified in 326 IAC 6-4-2(1) through (4) are violated. Observations of visible emissions crossing the property line of the source at or near ground level must be made by a qualified representative of IDEM. [326 IAC 6-4-5(c)]

326 IAC 6-5 (Fugitive Particulate Matter Emissions Limitations)

Pursuant to this rule, fugitive particulate matter emissions shall be controlled according to the plan submitted on July 18, 1997. This plan consists of adding gravel as needed to the unpaved stone and gravel roadways.

**State Rule Applicability - Individual Facilities**

326 IAC 6-3-2 PM Emission Limit (Process Operations)

Pursuant to 326 IAC 6-3-2 (Process Operations), the woodworking and machining operations from the service and repair center shall not exceed the allowable particulate matter (PM) emission rate of 0.48 pounds per hour.

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the woodworking facilities (Building No. 1 and Building No. 2) shall not exceed 13.4 pounds per hour when operating at a process weight rate of eleven-thousand six-hundred and seventy (11,670) pounds per hour.

Pursuant to 326 IAC 6-3 (Process Operations) and CP 039-4795, issued on March 25, 1996, the particulate matter (PM) emissions due to welding activities shall not exceed the allowable PM emission rate of 2.80 pound per hour.

The pounds per hour limitation was calculated using the following equation:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10\ P^{0.67}$$

where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

326 IAC 6-3-2 PM Emission Limit (Process Operations)

Pursuant to 326 IAC 6-3-2 (Process Operations), the PM from the spray booths (BR-1 and BR-2), paint booths B-1, B-2a and B-2b, B-3, B-4 and FRP booth shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10\ P^{0.67}$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

326 IAC 8-1-6 (BACT Synthetic Minor Limitation)

The VOC input to the fiberglass coating operations performed by BR-1 and BR-2 at the Service and Repair Center shall be limited to two (2) tons per calendar month (twenty-four (24) tons per year). Therefore, the Best Available Control Technology (BACT) requirements of 326 IAC 8-1-6 do not apply.

Pursuant to 326 IAC 8-1-6, the paint booths B-2, B-2a and B-2b are limited to VOC potential emissions of 70 tons per year for the three (3) combined emission units. This VOC emission cap/BACT limit will satisfy the requirements in 326 IAC 8-1-6.

326 IAC 8-1-6 (BACT)

Pursuant to 326 IAC 8-1-6, the paint booth located in the Research and Development Center and the FRP Booth are not subject to 326 IAC 8-1-6 because their VOC potential emissions are less than 25 tons per year.

326 IAC 8-1-6 (BACT)

Pursuant to 326 IAC 8-1-6 (BACT), the coatings utilized in the Spray Paint Booth, identified as emission unit B-4, for styrofoam and paper substrates shall be applied with high volume low pressure (HVLP) or airless spray guns. HVLP spray application is an accepted alternative method of application for Air Assisted Airless Spray Application. HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

326 IAC 8-2-9 (Miscellaneous Metal Coating Operations)

Paint Booth B-3 is subject to the requirements of 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations) because it surface coats on the metal frames. Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volume weighted average volatile organic compound (VOC) content of coating applied to metal frames in Booth B-3 and metal materials from caulk guns and aerosol cans shall be limited to 3.5 pounds of VOCs per gallon of coating less water, as delivered to the applicator for any calendar day.

Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

326 IAC 8-2-9(b)(4) (Miscellaneous Metal Coating Operations, Customized Top Coating)

The customized top coating applied for the purpose of recreational vehicles performed by the two (2) spray coating booths (BR-1 and BR-2) shall not exceed thirty-four (34) vehicles per day. 326 IAC 8-2-9(b)(4) exempts the customized to coating of automobiles and trucks if production is less than thirty-five (35) vehicles per day. The Permittee has agreed to limit production to thirty-four (34) vans per day. Therefore, the requirements of 326 IAC 8-2-9 do not apply to these coating booths.

326 IAC 8-2-9 (Miscellaneous Metal Coating Operations)

Paint Booths 2a and 2b are not subject to this rule because these operations are involved with the surface coating of plastic and fiberglass of the recreational vehicles or motor homes.

326 IAC 8-2-12 (Wood Furniture and Cabinet Coating)

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the surface coatings applied to wood furniture and/or wood components in the paint booth identified as B-1 or EU-01 shall utilize dip-and-drain or High Volume Low Pressure (HVLP) spray application at all times.

High Volume Low Pressure (HVLP) spray means technology used to apply coating to a substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

326 IAC 8-2-12 (Wood Furniture and Cabinet Coating)

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the coatings utilized in the Spray Paint Booth, identified as emission unit B-4, for wood substrates shall be applied with high volume low pressure (HVLP) or airless spray guns. HVLP spray application is an accepted alternative method of application for Air Assisted Airless Spray Application. HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

The woodworking operations located in the service and repair center and in the research and development center are not covered by 326 IAC 8-2-12 because the facilities are not engaged in applying coatings to wood substrates.

326 IAC 8-6 (Organic Solvent Emission Limitations)

The Spray Paint Booth, identified as emission unit B-4, is not subject to 326 IAC 8-6 (Organic Solvent Emission Limitations) because it was installed in 1983, it has VOC potential emissions less than 100 tons per year and it is located in Elkhart County.

**Compliance Requirements**

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in permit Section D are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also in permit Section D. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

The spray paint booths have applicable compliance monitoring conditions as specified below:

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, daily observations shall be made of the overspray while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(b) Weekly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an overspray emission, evidence of overspray emission, or other noticeable change in overspray emissions is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(c) An inspection shall be performed each calender quarter of all bags controlling the woodworking operations when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

(d) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

These monitoring conditions are necessary because the dry filters used in the spray paint booths and the PM control equipment (baghouse and dust control) used in the woodworking operations must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-7 (Part 70).

**Air Toxic Emissions**

Indiana presently requests applicants to provide information on emissions of the 187 hazardous air pollutants set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Management (OAM) Part 70 Application Form GSD-08.

(a) This source will emit levels of air toxics greater than those that constitute major source applicability according to Section 112 of the Clean Air Act.

(b) See attached calculations for detailed air toxic calculations.

**Conclusion**

The operation of this motor home and travel trailer manufacturing facility shall be subject to the conditions of the attached proposed Part 70 Permit No. T039-7571-00157.

# Indiana Department of Environmental Management
# Office of Air Management

## Addendum to the
## Technical Support Document for a Part 70 Operating Permit

| | |
|---|---|
| Source Name: | Newmar Corporation |
| Source Location: | 355 North Delaware Street, Nappanee, Indiana 46550-0030 |
| County: | Elkhart |
| SIC Code: | 3716 and 3792 |
| Operation Permit No.: | T039-7571-00157 |
| Permit Reviewer: | KERAMIDA/RMEH |

On October 31, 1998, the Office of Air Management (OAM) had a notice published in the Elkhart Truth, Elkhart, Indiana, stating that Newmar Corporation had applied for a Part 70 Operating Permit to operate a stationary motor home and travel trailer manufacturing plant. The notice also stated that OAM proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

Upon further review, the OAM has decided to make the following revisions to the permit (bolded language has been added, the language with a line through it has been deleted).

1. Section A.2 (Emission Units and Pollution Control Equipment Summary) has been revised as follows:

   b) ~~- One (1) Spray Paint Booth B-2, equipped with five (5) HVLP spray guns, identified as EU-02 (Custom Coating), with a maximum capacity of four (4) units per hour, using dry filters as control, and exhausting to stack SV-91. (1982)~~

   - Two (2) high volume low pressure (HVLP) spray applications for coating recreational vehicles/motor homes in each downdraft paint booth identified as B-2a and B-2b, each with a maximum capacity of one (1) recreational vehicle per hour, dry filters for the particulate matter overspray control, each booth exhausting to two separate stacks identified as SV2-3a, SV2-3b and SV2-4a, SV2-4b respectively. (1998)

2. Section B.11 (Annual Compliance Certification) has been revised as follows.

B.11 Annual Compliance Certification [326 IAC 2-7-6(5)]

(a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The certification shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than ~~July 1~~ **April 15** of each year to:

3. Section B.27(Credible Evidence)

IDEM now believes that this condition is not necessary and has removed it from the permit. The issues regarding credible evidence can be adequately addressed during a showing of compliance or noncompliance. Indiana's statutes, and the rules adopted under their authority, govern the admissibility of evidence in any proceeding. Indiana law contains no provisions that limit the use of any credible evidence and an explicit statement is not required in the permit.

A condition for Advanced Source Modification Approval has been added.

~~B.27 Credible Evidence [326 IAC 2-7-5(3)][62 Federal Register 8313][326 IAC 2-7-6]~~

~~Notwithstanding the conditions of this permit that state specific methods that may be used to assess compliance or noncompliance with applicable requirements, other credible evidence may be used to establish compliance or noncompliance.~~

B.27 **Advanced Source Modification Approval [326 IAC 2-7-5(16)]**

**The requirements to obtain a source modification approval under 326 IAC 2-7-10.5 or a permit modification under 326 IAC 2-7-12 are satisfied by this permit for the proposed emission units, control equipment or insignificant activities in Sections A.2 and A.3 if such modifications occur during the term of this permit.**

4. Section C.2 (Opacity) has been revised as follows.

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (~~Visible Emissions~~ **Opacity** Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), ~~visible emissions~~ **opacity** shall meet the following, unless otherwise stated in this permit:

(a) ~~Visible emissions~~ **Opacity** shall not exceed an average of forty percent (40%) ~~opacity~~ in ~~twenty-four (24) consecutive readings,~~ **any one (1) six (6) minute averaging period** as determined in 326 IAC 5-1-4.

(b) ~~Visible emissions~~ **Opacity** shall not exceed sixty percent (60%) ~~opacity~~ for more than a cumulative total of fifteen (15) minutes (sixty (60) readings **as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute non-overlapping integrated averages for a continuous opacity monitor)** in a six (6) hour period.

5. Section D.1.1(c) has been revised as follows:

(c) The input VOC to the paint area B-1 and the usage of cleanup solvent for the paint area B-1 (the usage of cleanup solvent may need to take into account any recycling of cleanup rags or reused solvent), **in combination with input VOC from Spray Paint Booth B-3, FRP Booth, and insignificant activities,** shall be limited to ~~90~~ **< 156** tons per 12 consecutive month period. This limitation will prevent the VOC emissions from the entire source to less than ~~249~~ **250** tons per year and make 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

6. Sections D.1.10, D.2.7, D.3.7, D.4.9, D.5.6 and D.6.8 (Monitoring) have been revised as follows.

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, ~~daily~~ **weekly** observations shall be made of the overspray from the surface coating booth stacks (1,2,3,4,5,7,8) while one or more of the booths are in operation. **During periods of inclement weather, observations will be performed weather permitting.** The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(b) ~~Weekly~~ **Monthly** inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

7. Section D.1.12 (Record Keeping Requirements) has been revised as follows.

(a) To document compliance with Condition D.1.1(c), the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.1(c).

(1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(2) A log of the ~~dates~~ **months** of use;

(3) The cleanup solvent usage for each month;

(4) The total VOC usage for each month; and

(5) The weight of VOCs emitted for each compliance period.

(b) To document compliance with Condition D.1.4, the Permittee shall maintain a log of ~~daily~~ **weekly** overspray observations, daily**,** ~~and weekly,~~ **and monthly** inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

8. Sections D.2, D.2.1, D.2.4, D.2.6, and D.2.7 have been revised as follows:

Section D.2
Facility Description [326 IAC 2-7-5(15)]:
~~- One (1) Spray Paint Booth B-2, equipped with five (5) HVLP spray guns, identified as EU-02 (Custom Coating), with a maximum capacity of four (4) units per hour, using dry filters as control, and exhausting to stack SV-91. (1982)~~

D.2.1 BACT Determination [326 IAC 8-1-6]
Pursuant to 326 IAC 8-1-6 and CP#039-9230-00157, issued on June 18, 1998, the input VOC of the coatings (primer, base, top and clear coats, cleaning solvents) in the paint booths ~~B-2,~~ B-2a and B-2b are limited to 70 tons of VOC ~~emissions~~ per year, rolled on a monthly basis, for the ~~three (3)~~ **two (2)** combined emission units.

D.2.4 Testing Requirements [326 IAC 8-1-4]
Testing of the facilities identified as ~~B-2,~~ B- 2a and 2b are not specifically required by this permit. However, if testing is required, compliance with the VOC limit specified in Condition D.2.1 shall be determined using a performance test conducted in accordance with Section C - Performance Testing.

D.2.6 Particulate Matter (PM)
The dry filters for particulate matter overspray control shall at all times be in place when paint booths identified as ~~B-2,~~ B- 2a and 2b are in operation.

D.2.7 Monitoring
(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the dry filters. To monitor the performance of the dry filters, daily observations shall be made of the overspray while the booths identified as ~~B-2,~~ B- 2a and 2b are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

9. Section D.2.8 (Record Keeping Requirements) has been revised as follows.

(a) To document compliance with Conditions D.2.1, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.2.1.

(1) The amount of VOC and HAP content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(2) A log of the ~~dates~~ **months** of use;

(3) The cleanup solvent usage for each month;

(4) The total VOC usage for each month;

(5) The total HAP usage for each month;

(6) The weight of VOC and HAPs emitted for each compliance period.

**(b) To document compliance with Condition D.2.2, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.**

(~~b~~ **c**) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

10. Section D.3.1(c) (Volatile Organic Compounds) has been revised as follows:

(c) The input VOC to the Spray Paint Booth B-3 and the usage of cleanup solvent for the Spray Paint Booth B-3 (the usage of cleanup solvent may need to take into account any recycling of cleanup rags or reused solvent), **in combination with input VOC from Spray Paint Booth B-1, FRP Booth, and insignificant activities,** shall be limited to ~~34~~ **< 156** tons per 12 consecutive month period. This limitation will prevent the VOC emissions from the entire source to less than ~~249~~ **250** tons per year and make 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

11. Section D.3.8 (Record Keeping Requirements) has been revised as follows.

(a) To document compliance with Condition D.3.1, the Permittee shall maintain records in accordance with (1) through (7) below. Records maintained for (1) through (7) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.3.1.

(1) The amount of VOC and HAP content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(2) A log of the ~~dates~~ **months** of use;

(3) The cleanup solvent usage for each month;

(4) The volume weighted VOC content of the coatings used for each day that any coating with VOC content greater than 3.5 pounds per gallon, less water, is used, by:

~~$\frac{\text{lb VOC}}{\text{gallon less water}} = \frac{3 \text{ coatings } [Dc * O * Q / [1 - W * Dc / Dw]]}{3C}$~~

~~Dc = density of coating, lb/gal Dw = density of water, lb/gal~~
~~O = weight percent organics, % Q = quantity of coating, gal/unit~~
~~W = percent volume water, % C = total of coatings used, gal/unit~~

**$A = \frac{3 (C * U)}{3 U}$ # 3.5 lb VOC/gal**

**A = Daily volume weighted average in pounds VOC per gallon**
**C = VOC content of coating in pounds VOC per gallon**
**U = usage rate of coating in gallons per day**

(5) The total VOC usage for each month;

(6) The total HAP usage for each month;

(7) The weight of VOC and HAPs emitted for each compliance period.

**(b) To document compliance with Condition D.3.2, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.**

(~~b~~**c**) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

12. Section D.4.2 (BACT Minor Limit) has been revised as follows:

~~The VOC input to the Styrofoam and paper substrates coating operations shall be limited to two (2) tons per calendar month (twenty-four (24) tons of VOC per year). Therefore, the Best Available control Technology (BACT) requirements of 326 IAC 8-1-6 will not apply. Any change or modification which may alter the Styrofoam and paper substrates coating operations such that allowable VOC emissions will increase to 25 tons per year or greater, shall obtain a permit modification pursuant to 326 IAC 8-1-6 before such change may occur.~~

**The water-based adhesive spray booth, identified as EU-04, is not subject to 326 IAC 8-1-6. However, any change or modification which may increase VOC potential emissions to 25 tons per year from the booth shall require prior approval from the OAM to determine applicability requirements of 326 IAC 8, before such change may occur**.

13. Section D.4.6 (Volatile Organic Compounds (VOC)) has been eliminated as follows:

~~D.4.6 Volatile Organic Compounds (VOC)~~

~~Compliance with the VOC usage limitation contained in Condition D.4.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3)(A) and 326 IAC 8-1-2(a)(7) using formulation data supplied by the coating manufacturer. IDEM, OAM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.~~

14. Section D.4.7 (VOC Emissions) has been eliminated as follows:

~~D.4.7 VOC Emissions~~

~~Compliance with Condition D.4.2 shall be demonstrated at the end of each month based on the total volatile organic compound usage for the most recent month.~~

15. Section D.4.10 (Record Keeping Requirements) has been revised as follows.

~~D.4.10~~ **D.4.8** Record Keeping Requirements

~~(a) To document compliance with Condition D.4.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and VOC emission limits established in Condition D.4.2.~~

~~(1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and EPA VOC Data Sheets~~

~~necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;~~

~~(2) A log of the dates of use;~~

~~(3) The cleanup solvent usage for each month;~~

~~(4) The total VOC usage for each month; and~~

~~(5) The weight of VOCs emitted for each compliance period.~~

~~(b)~~ **(a)** To document compliance with Condition D.4.~~8~~**3**, the Permittee shall maintain a log of ~~**daily**~~ **weekly** overspray observations, daily**,** ~~and weekly,~~ **and monthly** inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

~~(c)~~ **(b)** All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

16. Section D.4.11 (Reporting Requirements) has been eliminated as follows:

~~D.4.11 Reporting Requirements~~

~~A quarterly summary of the information to document compliance with Condition D.4.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. This summary report shall include the monthly VOC emitted and a daily record of the number of recreational vehicles processed.~~

17. Section D.5.2(b) (Volatile Organic Compounds) has been revised as follows:

(b) The input VOC to the FRP Booth and the usage of cleanup solvent for the FRP Booth (the usage of cleanup solvent may need to take into account any recycling of cleanup rags or reused solvent), in combination with input VOC from Spray Paint Booths B-1 and B-3 and insignificant activities, shall be limited to ~~34~~ **< 156** tons per 12 consecutive month period. This limitation will prevent the VOC emissions from the entire source to less than ~~249~~ **250** tons per year and make 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

18. Section D.5.7 (Record Keeping Requirements) has been revised as follows.

(b) To document compliance with Condition D.5.1, the Permittee shall maintain a log of ~~daily~~ **weekly** overspray observations, daily**,** ~~and weekly~~ **and monthly** inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

19. Section D.6.9 (Record Keeping Requirements) has been revised as follows.

(b) To document compliance with Condition **D**.6.~~8~~**3**, the Permittee shall maintain a log of ~~daily~~ **weekly** overspray observations, daily**,** ~~and weekly~~ **and monthly** inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

20. Section D.7.7 (Broken Bag or Failed Bag Detection) has been revised as follows.

D.7.7 Broken **or Failed** Bag ~~or Failure~~ Detection

In the event that bag failure has been observed.

(a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. ~~For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced.~~ **Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).**

(b) ~~Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion.~~ **For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).**

The following comments on the proposed Part 70 permit were submitted by Newmar Corporation on November 17, 1998.

Comment No. 1:
The technical contact on all documentation should be changed from Paul Troyer to Erick Click.

Response No. 1:
A technical contact is not listed in the Title V permit or TSD. No changes have been made.

Comment No. 2:
Regarding Section A.2, Source Summary, Emission Units and Pollution Control Equipment Summary, Newmar Corporation proposes that the sections be referenced to an emission unit number. Newmar proposes that sections (a), (b), (c), (d), (e), (f), and (g) read as follows:

(a) EU-01 (Hardwoods), One (1) Spray Paint Booth B-1, equipped with six (6) high volume low pressure (HVLP)...

(b) EU-02 (Custom Coating), One (1) Spray Paint Booth B-2, equipped with five (5) HVLP spray guns ...

(c) EU-03 (Frames), One (1) Spray Paint Booth B-3, equipped with two (2) airless spray guns...

(d) EU-04 (Adhesive), One (1) Spray Paint Booth B-4, equipped with two (2) HVLP spray guns...

(e) EU-05 (FRP), One (1) FRP Booth (seam work on special orders) ...

(f) EU-06 (R&D, Service & Warranty), One (1) Spray Paint Booth (R&D) ...

(g) EU-07 (Woodworking), One (1) woodworking shop equipped with woodworking ...

Response No. 2:
These changes have been made. Also see Comment No. 39

Comment No. 3:
Regarding Section A.2(a), Source Summary, Emission Units and Pollution Control Equipment Summary, the referenced stack numbers are not correct. Newmar Corporation proposes to amend the section as follows:

(a) EU-01 (Hardwoods), One (1) Spray Paint Booth B-1, equipped with six (6) high volume low pressure (HVLP) spray guns for coating of interior wood components with a maximum capacity of four (4) recreational vehicles per hour, with dry filters for the particulate matter overspray control, and exhausting to stack SV1-1 and SV1-2. (1982)
One (1) dip Tank, with a capacity of four (4) units per hour, exhausting to general ventilation. (1982)

Response No. 3:
This change has been made.

Comment No. 4
Regarding Section A.2(b), Source Summary, Emission Units and Pollution Control Equipment Summary, the referenced stack numbers are not correct. Newmar Corporation proposes to amend the section as follows:

(b) EU-02 (Custom Coating), One (1) Spray Paint Booth B-2, equipped with five (5) HVLP Spray Guns with a maximum capacity of four (4) units per hour, using dry filters as control and exhausting to stack SV2-1, SV2-2. (1982)
Two (2) HVLP Spray Guns for coating recreational vehicles/motor homes in each downdraft paint booth identified as B-2a and B-2b, each with a maximum capacity of one (1) recreational vehicle per hour, dry filters for the particulate matter overspray control, each booth exhausting to two separate stacks identified as SV2-3a, SV2-3b and SV2-4a, SV2-4b respectively. (1998)

Response No. 4:
These changes have been made. Also see Comment No. 39.

Comment No. 5:
Regarding Section A.2(c), Source Summary, Emission Units and Pollution Control Equipment Summary, the referenced stack numbers are not correct. Newmar Corporation proposes to amend the section as follows:

(c) EU-03 (Frames), One (1) Spray Paint Booth B-3, equipped with two (2) airless spray application for coating of metal frames with a maximum capacity of four (4) frames per hour, using dry filters as particulate matter overspray control, and exhausting to stack SV-3. (1990)

Response No. 5:
This change has been made.

Comment No. 6:
Regarding Section A.2(d), Source Summary, Emission Units and Pollution Control Equipment Summary, the referenced stack numbers are not correct. Newmar Corporation proposes to amend the section as follows:

(d) EU-04 (Adhesives), One (1) Spray Paint Booth B-4, equipped with two (2) HVLP spray guns, with a maximum capacity of four (4) units per hour, using dry filters as control, and exhausting to stacks SV4-1 and SV4-2. (1983)

Response No. 6:
This change has been made.

Comment No. 7:
Regarding Section A.2(e), Source Summary, Emission Units and Pollution Control Equipment Summary, the referenced stack numbers are not correct. Newmar Corporation proposes to amend the section as follows:

(e) EU-05 (FRP), One (1) FRP Booth (seam work on special orders), equipped with three (3) HVLP spray and hand lay-up application for coating fiberglass touch up and repair operation, with a maximum capacity of 0.12 units per hour, using dry filters for particulate matter overspray control and exhausting to stack SV-5. (1995)

Response No. 7:
This change has been made.

Comment No. 8:
Regarding Section A.2(f), Source Summary, Emission Units and Pollution Control Equipment Summary, the referenced stack numbers are not correct. Newmar Corporation proposes to amend the section as follows:

(f) EU-06 (R&D, Service and Warranty), One (1) Spray paint Booth (R&D), equipped with one (1) air atomized spray guns for fiberglass mold coating, with a production rate of 0.0031 unit per hour, located at the Research and Development Center. (1996)
Two (2) spray coating booths, identified as BR-1 and BR-2, equipped with HVLP Spray guns, using dry filters for overspray control, and exhausting at two (2) stacks, identified as SV6-1 and SV6-2. These booths have not been installed yet. When these are installed the proper notification will be submitted to IDEM. (1998)

Response No. 8:
These changes have been made.

Comment No. 9:
Regarding Section A.2(g), Source Summary, Emission Units and Pollution Control Equipment Summary, the referenced stack numbers are not correct. Newmar Corporation proposes to amend the section as follows:

(g) .... One (1) woodworking shop equipped with woodworking equipment, with a wood usage of 61 pounds per hour, attached to a portable dust collector as particulate control, exhausted internally, located at the Research and Development Center. (1996) ....

Response No. 9:
This change has been made.

Comment No. 10:
Regarding Section B.11, General Conditions, Annual Compliance Certification, the date for submitting the Annual Compliance Certification is not correct. The Compliance Certification is to be submitted on the same day as the annual emissions report, or April 15. Newmar requests that the submittal date be revised.

Response No. 10:
This change has been made.

Comment No. 11:
Regarding Section B.27, General Conditions, Credible Evidence, this permit requires very specific monitoring conditions elsewhere, i.e., Method 24 and Method 311. However, the statement eludes to vague and questionable methods that are subject to interpretation on a daily basis. Newmar Corporation feels that the above mentioned regulation is not binding, indefinite, and lofty. Therefore, Newmar requests the referred to section be deleted from the final permit.

Response No. 11:
This change has been made. Please refer to the OAM permit revision number 3.

Comment No. 12:
Regarding Section C.22, Source Operation Conditions, General Record Keeping Requirements, this requirement does not meet the intent of the law as defined at 326 IAC 2-7-5(3)(B). The requirement is onerous and would require implementing an entire new maintenance program as well as staff to manage such work orders, parts inventories, and standard operating procedures as required. Newmar requests that the above referenced requirements be deleted from the final permit.

Response No. 12:
The OAM believes that the stated record keeping requirements are required to ensure continuous compliance with the conditions in the permit. The condition has not been changed.

Comment No. 13:
Regarding Section C.23, Source Operation Conditions, General Reporting Requirements, this requirement is a duplicate of the requirement found in section B.11. Newmar feels that a statement of compliance can be submitted on annual basis and supply enough information to determine continual compliance with all required regulations.

Response No. 13:
IDEM has authority to require quarterly reports. Reports must be submitted at least every six months under 326 IAC 2-7-5(3)(C)(i). OAM believes that a period of time longer than every quarter will usually not provide sufficient reporting of continuous compliance. The condition has not been changed.

Comment No. 14:
Regarding Section D.1, Facility Operation Conditions, Facility Descriptions, the referenced stack numbers are not correct. Newmar Corporation proposes to amend the section as follows:

> EU-01 (Hardwoods), One (1) Spray Paint Booth B-1, equipped with six (6) high volume low pressure (HVLP) spray guns for coating of interior wood components with a maximum capacity of four (4) recreational vehicles per hour, with dry filters for the particulate matter overspray control, and exhausting to stack SV1-1 and SV1-2. (1982)

One (1) dip Tank, with a capacity of four (4) units per hour, exhausting to general ventilation. (1982)

Response No. 14:
These changes have been made.

Comment No. 15:
Regarding Sections D.1.10, D.2.7, D.3.7, D.4.9, D.5.6, and D.6.8, Facility Operation Conditions, Monitoring, the above mentioned requirement is one that is very difficult, if not impossible, to meet and dangerous to complete on a weekly basis. We utilize filters that are rated at 99% efficiency, meaning that 1% of all particulate matter is going to escape. This means that overspray emissions would be present on the rooftop and the ground making it impossible to meet the intent of this requirement. Requiring an employee to climb to the rooftop and look for overspray emissions increases the possibility of employee injury and increases the liability that Newmar incurs. Newmar requests that the above referenced requirement be deleted from the final permit.

Response No. 15:
Sections D.1.10, D.2.7, D.3.7, D.4.9, D.5.6 and D.6.8 (Monitoring) have been revised to require weekly observations of overspray from the spray coating booths stacks when weather permits, and monthly inspections of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground, as shown in the OAM permit revision number 6. The OAM believes that the stated monitoring requirements are required to ensure continuous compliance with the conditions in the permit.

Comment No. 16:
Regarding Section D.1.12, Facility Operation Conditions, Recordkeeping Requirements, Newmar Corporation currently keeps all MSDS on file to demonstrate compliance with the HazCom requirements of OSHA. Therefore, Newmar requests the MSDS requirement be deleted from the above requirement and read as follows:

(1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders and invoices necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

Response No. 16:
The OAM believes that the stated record keeping requirements are required to document continuous compliance with the conditions in the permit. The condition has not been changed.

Comment No. 17:
Regarding Section D.1.12, Facility Operation Conditions, Record Keeping Requirements,
Newmar feels that IDEM is trying to impose daily record keeping of materials, when the permit only requires monthly recordkeeping reported quarterly. Newmar suggests that the phrase at (a)(2), “A log of the dates of use”, be deleted from the final permit.

Response No. 17:
Section D.1.12 has been changed to “A log of the months of use”.

Comment No. 18:
Regarding Section D.2, Facility Operation Conditions, Facility Descriptions, the referenced stack numbers are not correct. Newmar Corporation proposes to amend the section as follows:

EU-02 (Custom Coating), One (1) Spray Paint Booth B-2, equipped with five (5) HVLP Spray

Guns with a maximum capacity of four (4) units per hour, using dry filters as control and exhausting to stack SV2-1, SV2-2. (1982)

Two (2) HVLP Spray Guns for coating recreational vehicles/motor homes in each downdraft paint booth identified as B-2a and B-2b, each with a maximum capacity of one (1) recreational vehicle per hour, dry filters for the particulate matter overspray control, each booth exhausting to two separate stacks identified as SV2-3a, SV2-3b and SV2-4a, SV2-4b respectively. (1998)

Response No. 18:
These changes have been made. Also see Comment No. 39.

Comment No. 19:
Regarding Section D.2.8, Facility Operation Conditions, Recordkeeping Requirements,
Newmar Corporation currently keeps all MSDS on file to demonstrate compliance with the HazCom requirements of OSHA. Newmar also feels that tracking of solvents used for cleaning and those used for addition to coatings is onerous and not required by the Indiana Code. Therefore, Newmar requests the MSDS requirement and the differentiation of solvents used for cleanup and those used for additions to coatings be deleted from the above requirement and read as follows:

(1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders and invoices necessary to verify the type and amount used.

Response No. 19:
The OAM believes that the stated record keeping requirements are required to document continuous compliance with the conditions in the permit. The condition has not been changed.

Comment No. 20:
Regarding Section D.2.8, Facility Operation Conditions, Record Keeping Requirements,
Newmar feels that IDEM is trying to impose daily record keeping of materials, when the permit only requires monthly recordkeeping reported quarterly. Newmar suggests that the phrase at (a)(2), “A log of the dates of use”, be deleted from the final permit.

Response No. 20:
Section D.2.8 has been changed to “A log of the months of use”.

Comment No. 21:
Regarding Section D.2.8, Facility Operation Conditions, Record Keeping Requirements, Newmar feels that the requirement to maintain records of, “The cleanup solvent usage for each month”, is going above and beyond the requirements set forth in the Clean Air Act. Therefore, Newmar requests that the phrase, “The cleanup solvent usage for each month”, be deleted from the final permit.

Response No. 21:
The OAM believes that the stated record keeping requirement for cleanup solvent usage is necessary to document continuous compliance with the conditions in the permit, specifically those pursuant to 326 IAC 8-1-6 (BACT) and CP#039-9230-00157. The condition has not been changed.

Comment No. 22:
Regarding Section D.3, Facility Operation Conditions, Facility Descriptions, the reference to stack number and the type of gun utilized for application is not correct. Newmar proposes to amend the above mentioned section to read as follows:

(c) EU-03 (Frames), One (1) Spray Paint Booth B-3, equipped with two (2) airless spray application for coating of metal frames with a maximum capacity of four (4) frames per hour, using dry filters as particulate matter overspray control, and exhausting to stack SV-3. (1990)

Response No. 22:
These changes have been made.

Comment No. 23:
Regarding Section D.3.8, Facility Operation Conditions, Recordkeeping Requirements, Newmar Corporation currently keeps all MSDS on file to demonstrate compliance with the HazCom requirements of OSHA. Newmar also feels that tracking of solvents used for cleaning and those used for addition to coatings is onerous and not required by the Indiana Code. Therefore, Newmar requests the MSDS requirement and the differentiation of solvents used for cleanup and those used for additions to coatings be deleted from the above requirement and read as follows:

(1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders and invoices necessary to verify the type and amount used.

Response No. 23:
The OAM believes that the stated record keeping requirements for MSDS and solvent differentiation are necessary to document continuous compliance with the conditions stated in D3.1, which includes conditions for compliance with VOC emission < 250 tons/12 consecutive month period, which makes 326 IAC 2-2 (PSD) not applicable. The condition has not been changed.

Comment No. 24:
Regarding Section D.3.8, Facility Operation Conditions, Record Keeping Requirements,
Newmar feels that IDEM is trying to impose daily record keeping of materials, when the permit only requires monthly recordkeeping reported quarterly. Newmar suggests that the phrase at (a)(2), “A log of the dates of use”, be deleted from the final permit.

Response No. 24:
Section D.3.8 (a) 2 has been changed to “A log of the months of use”.

Comment No. 25:
Regarding Section D.3.8, Facility Operation Conditions, Record Keeping Requirements,
Newmar feels that the requirement to maintain records of, “The cleanup solvent usage for each month”, is going above and beyond the requirements set forth in the Clean Air Act. Therefore, Newmar requests that the phrase, “The cleanup solvent usage for each month”, be deleted from the final permit.

Response No. 25:
The OAM believes that the stated record keeping requirements for cleanup solvent usage are necessary to document continuous compliance with the conditions stated in D3.1, which includes conditions for compliance with VOC emission < 250 tons/12 consecutive month period, which makes 326 IAC 2-2 (PSD) not applicable. The condition has not been changed.

Comment No. 26:
Regarding Section D.4, Facility Operation Conditions, Facility Descriptions, the reference to stack number is not correct. Newmar proposes to amend the above mentioned section to read as follows:

(d) EU-04 (Adhesives), One (1) Spray Paint Booth B-4, equipped with two (2) HVLP spray guns, with a maximum capacity of four (4) units per hour, using dry filters as control, and exhausting to stacks SV4-1 and SV4-2. (1983)

Response No. 26:
This change has been made.

Comment No. 27:
Regarding Section D.4.1, Facility Operation Conditions, Volatile Organic Compounds, the substrates being coated in this particular process does not meet the definition of Wood Furniture and Cabinet Coating, Established by the EPA. Therefore 326 IAC 8-2-12 does not apply to Newmar. Newmar requests that the section be deleted from the final permit.

Response No. 27:
The OAM has determined that the substrates coated in the process described in Section D.4.1 meet the state definition of wood furnishings described in 326 IAC 8-2-12. The condition has not been changed.

Comment No. 28:
Regarding Section D.4.10, Facility Operation Conditions, Recordkeeping Requirements, Newmar Corporation currently keeps all MSDS on file to demonstrate compliance with the HazCom requirements of OSHA. Newmar also feels that tracking of solvents used for cleaning and those used for addition to coatings is onerous and not required by the Indiana Code. Therefore, Newmar requests the MSDS requirement and the differentiation of solvents used for cleanup and those used for additions to coatings be deleted from the above requirement and read as follows:

(1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders and invoices necessary to verify the type and amount used.

Response No. 28:
The OAM believes that the stated record keeping requirements for MSDS and solvent differentiation are necessary to document continuous compliance with the conditions stated in D3.1, which includes conditions for compliance with VOC emission < 250 tons/12 consecutive month period, which makes 326 IAC 2-2 (PSD) not applicable. The condition has not been changed.

Comment No. 29:
Regarding Section D.4, Facility Operation Conditions, Facility Descriptions, the reference to stack number is not correct. Newmar proposes to amend the above mentioned section to read as follows:

EU-05 (FRP), One (1) FRP Booth (seam work on special orders), equipped with three (3) HVLP spray and hand lay-up application for coating fiberglass touch up and repair operation, with a maximum capacity of 0.12 units per hour, using dry filters for particulate matter overspray control and exhausting to stack SV-5. (1995)

Response No. 29:
This change has been made.

Comment No. 30:
Regarding Section D.5.2, Facility Operation Conditions, Volatile Organic Compound, Newmar feels that the above referenced section is not correct. We feel the limit should be 5 tons per year, as compared to 34 tons per year, to maintain compliance with 326 IAC 2-2, PSD Rules. Newmar requests that D.5.2 (b) to read as follows:

(b) The input VOC to the FRP Booth and the usage of cleanup solvent for the FRP Booth (the usage of cleanup solvent may need to take into account any recycling of cleanup rags or reused solvent) shall be limited to 5 tons per 12 consecutive month period. This limitation will prevent the VOC emissions from the entire source to less than 249 tons per year and make 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

Response No. 30:
See Comment and Response No. 38.

Comment No. 31:
Regarding Section D.5.4, Facility Operation Conditions, VOC Emissions, the referenced Section D.5.1(b) is incorrect. The reference should be D.5.2(b).

Response No. 31:
This change has been made.

Comment No. 32:
Regarding Section D.6, Facility Operation Conditions, Facility Descriptions, the reference to stack number is not correct. Newmar proposes to amend the above mentioned section to read as follows:

> EU-06 (R&D, Service and Warranty), One (1) Spray paint Booth (R&D), equipped with one (1) air atomized spray guns for fiberglass mold coating, with a production rate of 0.0031 unit per hour, located at the Research and Development Center. (1996)
> Two (2) spray coating booths, identified as BR-1 and BR-2, equipped with HVLP Spray guns, using dry filters for overspray control, and exhausting at two (2) stacks, identified as SV6-1 and SV6-2. These booths have not been installed yet. When these are installed the proper notification will be submitted to IDEM. (1998)

Response No. 32:
This change has been made.

Comment No. 33:
Regarding Section D.7.4, Facility Operation Conditions, Particulate Matter, Newmar's baghouse at North Delaware Street is exhausted inside at all times. Newmar requests that the previous section be revised as follows:

> The baghouse used for PM control shall be in operation at all times when the woodworking machines located at North Delaware Street are in operation and exhausting to the **inside** atmosphere.

Response No. 33:
The suggested change would enable the woodworking machines to be operated uncontrolled when exhausting to the outside atmosphere. This operation scenario would not be in compliance with 326 IAC 6-3-2(c) and possibly 326 IAC 5-1. The following change has been made:

> The baghouse used for PM control shall be in operation at all times when the woodworking machines located at North Delaware Street are in operation ~~and exhausting to the **inside** atmosphere~~.

Comment No. 34:
Regarding Section D.7.5, Facility Operation Conditions, Visible Emissions Notations, all of Newmar's baghouses are vented internally, therefore, section D.7.5 does not apply to Newmar. Newmar requests that the entire section, D.7.5, be deleted from the final permit.

Response No. 34:
The following change has been made:

> Daily visible emission notations of the woodworking facility located at North Delaware Street and the woodworking shop located at Research and Development Center stacks exhaust shall be performed during normal daylight operations when exhausting to the **outside** atmosphere. A trained employee shall record whether emissions are normal or abnormal.

Comment No. 35:
Regarding Section D.7.6, Facility Operation Conditions, Parametric Monitoring, all of Newmar's baghouses are vented internally, therefore, section D.7.6 does not apply to Newmar. Newmar requests that the entire section, D.7.6, be deleted from the final permit.

Response No. 35:
The OAM believes that these parametric monitoring requirements are required to ensure proper operation of emissions control devices. The condition was not changed.

Comment No. 36:
Regarding Section D.7.8(a), Facility Operation Conditions, Record Keeping Requirements, all of Newmar's baghouses are vented internally, therefore, this section does not apply to Newmar. Newmar requests that the entire section, D.7.8(a), be deleted from the final permit.

Response No. 36:
The following change has been made:

> (a) To document compliance with Condition D.7.5, the Permittee shall maintain records of daily visible emission notations of the woodworking facility (located at North Delaware Street) and the woodworking shop (located at Research and Development Center) stacks exhausts **when exhausting to the outside atmosphere.**

Comment No. 37:
Regarding Section D.7.8(b)(8), Facility Operation Conditions, Record Keeping Requirements, Newmar would like a clarification of this particular requirement, (8).

Response No. 37:
The requirement at Section D.7.8(b)(8) requires documentation of the dates when the exhaust from any particulate control device is redirected, either from external exhaust to internal exhaust, or internal exhaust to external exhaust.

Comment No. 38:
Newmar requests that a Plant wide Applicability Limit (PAL) of 249 TPY be established to allow for maximum flexibility of operation in conjunction with overall compliance.

Response No. 38:
A phone conversation between OAM permit reviewer Barbara Goldblatt and Newmar representative Eric Click on June 23, 1999, established that Newmar is no longer interested in obtaining a PAL. However, VOC limitations have been adjusted according to the following tables, which should be used in place of the **Limited Potential to Emit** table from p. 6 and PSD Minor Limit table from p. 9 of the Technical Support Document. Also see Comment Nos. 39 and 40.

| | **Limited Potential to Emit (tons/year)** | | | | | | |
|---|---|---|---|---|---|---|---|
| **Process / facility** | **PM** | **PM-10** | **$SO_2$** | **VOC** | **CO** | **$NO_X$** | **HAPs** |
| Fiber Glass Coating Operations BR-1 and BR-2 | - | - | - | 24 (2 tons per calendar month) | - | - | - |
| Paint Booths B-2a and B-2b | - | - | - | 70 tons per year | - | - | - |
| Woodworking shop (located at North Delaware Street) | 13.37 lbs/hr | - | - | - | - | - | - |
| Woodworking shop (located at Service and Repair Center) | 0.48 lbs/hr | - | - | - | - | - | - |
| Woodworking shop (located at Research and Development Center) | 0.40 lbs/hr | - | - | - | - | - | - |
| Paint Booths B-1 and B-3, FRP Booth, and insignificant units | - | - | - | < 156 | - | - | - |
| Entire Source | - | - | - | < 250 | - | - | - |

| **Facility** | **VOC Limit (ton/year)** |
|---|---|
| Fiberglass Coating Operations BR-1 and BR-2 | 24 (2 tons per calendar month) |
| Paint Booths B-2a and B-2b | 70 |
| Spray Booths B-1and B-3, FRP Booth, and other emissions from insignificant units | < 156 |
| **Total** | **< 250** |

The following comments on the proposed Part 70 Permit were submitted by Newmar Corporation on April 20, 1999.

Comment No. 39:

Booth 2 (CP-039-9230-00157) will be taken out of service. Booths 2a and 2b will remain in service with the applicable limit of 70 TPY as set forth in Section D.1.4. Booth 1, hardwoods, will be moved to the current location of Booth 2. The same number of guns and the same equipment will be utilized.

Response No. 39.

References to booth B-2 have been removed from the proposed Part 70 Permit. Appendix A in this TSD Addendum reflect the resulting changes in actual and potential emissions.

The following comments on the proposed Part 70 Permit were submitted by Newmar Corporation on June 4, 1999.

Comment No. 40

We have eliminated the Methylene Chloride based adhesive (Booth 4) and replaced it with a water based adhesive.

Response No. 40

The following table, which excludes Methylene Chloride and Propylene Oxide, should be used in place of the HAP **Potential Emissions** table from p. 5 of the Technical Support Document. Appendix A in this TSD Addendum reflects resulting changes in actual and potential emissions. Also see Response No. 38 to note additional table changes from Technical Support Document related to the change from a solvent based adhesive in Booth 4.

| HAP's | Potential Emissions (tons/year) |
|---|---|
| Glycol ether | less than 10 |
| Toluene | greater than 10 |
| Methanol | less than 10 |
| MEK | less than 10 |
| MIBK | greater than 10 |
| Xylene | less than 10 |
| Naphthalene | less than 10 |
| Formaldehyde | less than 10 |
| Ethylbenzene | less than 10 |
| Styrene | less than 10 |
| Methyl methacrylate | less than 10 |
| TOTAL | greater than 25 |

# Appendix A

**Newmar Corporation**
**355 North Delaware Street**
**Nappanee, Indiana 46550-0030**

**Actual Emissions - 2000 Operating Hours / year**
**Emission units - tons/year**

| Facility | VOC | PM | Glycol ether | Toluene | Methanol | MEK | MIBK | Xylene | Naphthalene | Formaldehyde | Ethylbenzene | Styrene | Methyl methacrylate | Combined HAP |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Booth 1 | 25.88 | 7.5 | - | 2.91 | 0.38 | 0.54 | 0.96 | 1.24 | 0.60 | 0.01 | 0.06 | - | - | 6.70 |
| Booth 3 | 7.81 | 36.5 | 0.35 | 1.58 | 0.38 | 0.28 | 0.73 | 0.08 | - | - | 0.02 | - | - | 3.42 |
| Booth 4 | - | 3.8 | - | - | - | - | - | - | - | - | - | - | - | - |
| FRP Booth | 1.22 | 12.3 | - | - | - | - | - | - | - | - | - | 0.64 | 0.06 | 0.70 |
| Miscellaneous usage | 2.00 | 25.5 | 0 | - | - | - | - | 0.60 | - | - | - | - | - | 0.60 |
| Total | 36.91 | 85.6 | 0.35 | 4.49 | 0.76 | 0.82 | 1.69 | 1.92 | 0.60 | 0.01 | 0.08 | 0.64 | 0.06 | 11.42 |

**Potential Emissions - 8760 Operating Hours / year**
**Emission units - tons / year**

| Facility | VOC | PM | Glycol ether | Toluene | Methanol | MEK | MIBK | Xylene | Naphthalene | Formaldehyde | Ethylbenzene | Styrene | Methyl methacrylate | Combined HAP |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Booth 1 | 181 | 12 | 0.01 | 20.39 | 2.65 | 3.78 | 6.76 | 4.53 | - | 0.05 | 0.40 | - | - | 38.57 |
| Booth 3 | 55 | 58 | 2.48 | 11.04 | 2.65 | 1.99 | 5.10 | 0.57 | - | - | 0.12 | - | - | 23.95 |
| Booth 4 | - | 383 | - | - | - | - | - | - | - | - | - | - | - | - |
| FRP Booth | 9 | 20 | - | - | - | - | - | - | - | - | - | 4.54 | 0.41 | 4.95 |
| Miscellaneous usage | 10 | 26 | - | 0.01 | - | - | - | 4.18 | - | - | - | - | - | 4.19 |
| Total | 255 | 499 | 2.49 | 31.44 | 5.30 | 5.77 | 11.86 | 9.28 | - | 0.05 | 0.52 | 4.54 | 0.41 | 71.66 |